

1 Erich P. Wise/State Bar No. 63219
 2 erichw@fdw-law.com
 3 FLYNN, DELICH & WISE LLP
 4 One World Trade Center, Suite 1800
 5 Long Beach, CA 90831-1800
 6 Telephone: (562) 435-2626 Facsimile: (562) 437-7555

7
 8 Attorneys for Defendants
 9 TRUMP CARD, INC.
 10 TIFLOR TRANSPORTATION, LLC (dba TRUMP CARD SAN DIEGO)
 11 TRUMP CARD HOLDINGS, INC.
 12 TRUMP CARD CALIFORNIA, INC.
 13 MAGNATE HOLDINGS, LLC
 14 MAGNATE WORLDWIDE, LLC

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

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 13 THE BOARD OF TRUSTEES OF THE) Case No.:
 14 LELAND STANFORD JUNIOR UNIVERSITY,)
 15 Plaintiff,) DEFENDANTS TRUMP CARD, INC.,
 16 v.) TIFLOR TRANSPORTATION, LLC (DBA
 17 TRUMP CARD SAN DIEGO), TRUMP) CARD HOLDINGS, INC., TRUMP CARD
 18 CALIFORNIA, INC., MAGNATE) HOLDINGS, LLC, AND MAGNATE
 19 WORLDWIDE, LLC'S NOTICE OF) REMOVAL OF ACTION UNDER 28
 20 U.S.C. § 1441(a)
 21 TRUMP CARD, INC. (a California corporation)
 22 and LLC); TIFLOR TRANSPORTATION, LLC) (FEDERAL QUESTION)
 23 (a California LLC) (dba TRUMP CARD SAN)
 24 DIEGO); TRUMP CARD HOLDINGS, INC. (a) 28 U.S.C. § 1331, §1337(a), 1441(a)
 25 California corporation and LLC); TRUMP CARD) 49 U.S.C. § 14706(d)
 26 CALIFORNIA, INC. (a California corporation)
 27 and LLC); SIMPATICO, INC. (a California)
 28 corporation); MAGNATE HOLDINGS, LLC)
 (corporate status unknown); MAGNATE)
 WORLDWIDE, LLC (an Illinois LLC);)
 GHUMAN TRANSPORT CORPORATION (a)
 California corporation); BIRKIRAN SINGH (a)
 California resident); RAPID TRUCKING, LLC (a)
 California corporation and LLC); TRANS)
 XPRESS LINE, INC. (a California corporation)
 and LLC); JERMAINE MARKEES TURNER (a)
 California resident); and DOES 1 through 50,)
 inclusive,)
)
 Defendants.)

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

2 PLEASE TAKE NOTICE that Defendants Magnate Worldwide, LLC, Magnate
 3 Holdings, LLC, Trump Card Holdings, Inc., Trump Card California, Inc., Trump Card, Inc.,
 4 and Tiflor Transportation, LLC dba Trump Card San Diego (hereinafter "Petitioners"), hereby
 5 remove the above-entitled action from state court to the United States District Court, Northern
 6 District of California, on the following grounds:

7 1. On December 14, 2017, an action was commenced in the Superior Court of
 8 the State of California, County of San Mateo, entitled *The Board of Trustees of the Leland*
 9 *Stanford Junior University, Plaintiffs vs. Trump Card, Inc.; Tiflor Transportation, LLC (dba*
 10 *Trump Card San Diego); Trump Card Holdings, Inc.; Trump Card California, Inc.; Simpatico,*
 11 *Inc.; Magnate Holdings, LLC; Magnate Worldwide, LLC; Ghuman Transport Corporation;*
 12 *Birkiran Singh; Rapid Trucking, LLC; Tranx Xpress Line, Inc; Jermaine Markeese Turner; and*
 13 *Does 1 to 50, inclusive, Defendants*, as case number 17CIV05727.

14 2. On February 6, 2018, Plaintiff filed an Amendment to the Complaint,
 15 substituting Landstar System, Inc. and Pride Logistics for Doe Defendants 1 and 2.

16 3. On February 21, 2018, Plaintiff filed an Amendment to the Complaint,
 17 correcting the name of Doe Defendant 1 from Landstar System, Inc. to Landstar Express
 18 America, Inc.

19 4. Petitioners were served with the Summons and Complaint on February 8,
 20 2018.

21 5. This action is civil in nature and is brought by Plaintiff to recover damages
 22 relating to claims of property loss, breach of contract and negligence relating to cargo that was
 23 damaged on or about January 24, 2017 while the cargo was being transported by motor carrier
 24 in interstate commerce.

25 6. In the Complaint, Plaintiff alleges that Petitioners, along with Defendants
 26 Simpatico, Inc., Ghuman Transport Corporation, Birkiran Singh, Rapid Trucking, LLC, and
 27 Does 1-20 ("Contracting Defendants") "were engaged in the business of interstate and
 28 intrastate transportation of goods, and owned, operated, controlled, drove, and managed

1 vehicles for that purpose.” Plaintiff has asserted causes of action for breach of contract and
 2 negligence against the Contracting Defendants, who Plaintiff claims were contracted to
 3 “transport a device known as a ‘wiggler’ from Lemont, Illinois to Plaintiff’s facility in Menlo
 4 Park, California”, when Contracting Defendants’ vehicle was involved in an accident on
 5 January 24, 2017 in New Mexico, resulting in damage to the wiggler.

6 7. Plaintiff further alleges that Defendants Trans Xpress Line, Inc., Jermaine
 7 Markees Turner, and Does 21-30 (the “Non-Contract Defendants”) were “engaged in the
 8 business of interstate and intrastate transportation of goods, and owned, operated, controlled,
 9 drove, and managed vehicles for that purpose.” Plaintiff alleges that the Non-Contracting
 10 Defendants were negligently “operating their vehicle on a public roadway in the State of New
 11 Mexico when [they] were involved in a subsequent accident near the location of the first
 12 accident involving the Contracting Defendants’ vehicle, resulting in further damage to and the
 13 near destruction of the ‘wiggler’ being transported by the Contracting Defendants.”

14 8. **Jurisdiction:** Based on the foregoing, the allegations of the Complaint
 15 establish that this is an action involving alleged loss of goods or damage to goods arising out of
 16 the interstate carriage of those goods by a motor common carrier. This Court has original
 17 jurisdiction over this action under 28 U.S.C. § 1331, §1337(a), and 49 U.S.C. § 14706(d), and
 18 the case may be removed to this Court by Petitioners under 28 U.S.C. § 1441(a) because
 19 Plaintiff’s claims arise under 49 U.S.C. § 14706 and any state law claims are preempted by 49
 20 U.S.C. § 14706. *Hall v. North American Van Lines, Inc.*, 476 F.3d 683, 688 (9th Cir. 2007).

21 9. **Intradistrict Assignment:** Under Local Rule 3-2(c), this action should be
 22 assigned to the San Francisco Division or the Oakland Division because the state court action is
 23 pending in San Mateo County.

24 10. Counsel for defendants Rapid Trucking, LLC and Landstar Express America,
 25 Inc. have advised that they consent to removal of this action. No other defendants have
 26 appeared in this action. On March 7, 2018, Gina Beltramo, Esq. of Coddington, Hicks &
 27 Danforth, counsel for Defendants Birkiran Singh and Ghuman Transportation Corporation,
 28 advised that she has not received instructions from her clients regarding whether they consent

1 to removal of this action. Ms. Beltramo advised she will contact Petitioners as soon as she
2 receives instructions from her clients. Although Plaintiff has filed Proofs of Service of
3 Summons on Defendants Simpatico, Inc. and Jermaine Markees Turner, Petitioners are unable
4 to confirm whether these Defendants consent to removal as they have yet to appear in this
5 action and Petitioners were unable to locate contact information for these Defendants.
6 Although Plaintiff has filed a Proof of Service of Summons on Pride Logistics, on March 7,
7 2018, Richard Thorne, the agent for service of process for Pride Logistics advised that he was
8 never served with the Summons and Complaint. On March 7, 2018, Amandeep Rathore, the
9 agent for service of process for Trans Xpress Line, Inc., advised that he has referred the matter
10 to his insurance carrier and was unable to consent to removal without speaking to his insurance
11 carrier. Mr. Rathore advised that he will contact Petitioners after speaking to his insurance
12 carrier.

13 11. Petitioners further file herewith true and correct copies of the Summons and
14 Complaint, filed in the state court, and all other pleadings, process and orders served on
15 Petitioners in the state court action (attached as Exhibit A hereto).

16 WHEREFORE, Petitioners request that the captioned action pending in the Superior
17 Court of the State of California, County of San Mateo, be removed to this United States
18 District Court, Northern District of California, and that all proceedings in the Superior Court of
19 California in the matter be discontinued.

21 Dated: March 8, 2018

FLYNN, DELICH & WISE LLP

By:

Erich P. Wise
Attorneys for Defendants
TRUMP CARD, INC.
TIFLOR TRANSPORTATION, LLC
(dba TRUMP CARD SAN DIEGO)
TRUMP CARD HOLDINGS, INC.
TRUMP CARD CALIFORNIA, INC.
MAGNATE HOLDINGS, LLC
MAGNATE WORLDWIDE, LLC

Exhibit A

1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
4 Santa Clara, CA 95050
Telephone: 408/261-1200
Facsimile: 408/985-9042
kcb@bowervonraesfeld.com

5 Attorneys for Plaintiff
6 THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court

Al Hansen
DRAFTED

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION
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13 THE BOARD OF TRUSTEES OF THE
14 LELAND STANFORD JUNIOR
15 UNIVERSITY,

16 Plaintiff,

17 v.

18 TRUMP CARD, INC. (a California
19 corporation and LLC); TIFLOR
20 TRANSPORTATION, LLC (a California
21 LLC) (dba TRUMP CARD SAN DIEGO);
22 TRUMP CARD HOLDINGS, INC. (a
23 California corporation and LLC); TRUMP
24 CARD CALIFORNIA, INC. (a California
25 corporation and LLC); SIMPATICO, INC. (a
California corporation); MAGNATE
HOLDINGS, LLC (corporate status
unknown); MAGNATE WORLDWIDE,
LLC (an Illinois LLC); GHUMAN
TRANSPORT CORPORATION (a
California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
LLC (a California corporation and LLC);
TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
TURNER (a California resident); and DOES
1 to 50, inclusive;

26
27 Defendants.

17C1V05727
Case No.:

COMPLAINT FOR DAMAGES
[DAMAGE TO PROPERTY,
PROPERTY LOSS, BREACH OF
CONTRACT, NEGLIGENCE]

BY FAX

17-CIV-05727
CMP
Complaint
876882



28
-1-
COMPLAINT FOR DAMAGES
[DAMAGE TO PROPERTY, PROPERTY LOSS, BREACH OF CONTRACT, NEGLIGENCE]

1 COMES NOW Plaintiff THE BOARD OF TRUSTEES OF THE LELAND
 2 STANFORD JUNIOR UNIVERSITY, and alleges as follows:

3 **ALLEGATIONS COMMON TO EACH CAUSE OF ACTION**

4 1. Stanford is informed and believes and thereon alleges that all but one of the
 5 Defendants referenced above are residents (corporate, LLC or individual) of the State of
 6 California. Stanford alleges that all of the Defendants, and each of them, are legally
 7 responsible to Stanford in damages as a consequence of the acts, omissions, breaches of
 8 contract, and breaches of other duties implied and imposed by law, all of which led to
 9 Stanford's damages as set forth in the instant Complaint.

10 2. Defendants TRUMP CARD, INC. (a California corporation and LLC); TIFLOR
 11 TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP
 12 CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD
 13 CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California
 14 corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE
 15 WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT CORPORATION (a
 16 California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING, LLC
 17 (a California corporation and LLC); and DOES 1 through 20, inclusive, (hereinafter the
 18 "Contracting Defendants") contracted with Stanford and/or were subcontractors, employees or
 19 agents of a Contracting Defendant, and are liable to Plaintiff for breach of contract, negligent
 20 employment, and other associated theories, as alleged more fully below. Defendants TRANS
 21 EXPRESS, LINE, INC., JERMAINE MARKEES TURNER and DOES 21 through 40,
 22 inclusive (hereinafter the "Non-Contracting Defendants") did not contract directly with
 23 Stanford and are responsible for Plaintiff's damages solely on the basis of negligence, negligent
 24 employment, or other tortious conduct.

25 3. Stanford is informed and believes that each and every Defendant, in performing
 26 the services for Stanford or other associated entities or individuals, or acting within the course
 27 and scope of employment or agency of each of the remaining Defendants, acted directly and/or
 28 derivatively and as a result each and every Defendant is a co- or joint-tortfeasor, so that the

1 liability alleged in this Complaint inures to each and every Defendant, whether liability is based
 2 upon individual activities or omissions implied and inherent within said agency and/or
 3 employment, or otherwise.

4 4. Stanford is unaware of the true names and capacities, whether individual,
 5 corporate, associate, or otherwise of defendants sued herein as DOES 1 through 50, inclusive,
 6 and therefore sues these defendants by such fictitious names under the provisions of California
 7 Code of Civil Procedure §474 and/or other applicable law. Stanford will ask leave to amend
 8 this Complaint to allege said defendants' true names and capacities when they have been
 9 ascertained. Stanford is informed and believes and thereon alleges that each of the fictitiously
 10 named defendants is negligently responsible in some manner or otherwise legally responsible
 11 for the occurrences and damages herein described.

12 5. Stanford is informed and believes and thereon alleges that at all times herein
 13 mentioned Defendants TRUMP CARD, INC. (a California corporation and LLC); TIFLOR
 14 TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP
 15 CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD
 16 CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California
 17 corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE
 18 WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT CORPORATION (a
 19 California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING, LLC
 20 (a California corporation and LLC); and DOES 1 through 20, inclusive, and each of them (the
 21 "Contracting Defendants,") were the agents, servants, employers and/or employees of each the
 22 other Contracting Defendants and in doing the things hereinafter alleged were acting within the
 23 scope of such agency, service and/or employment and with the permission and consent of said
 24 Contracting Defendants referenced in this paragraph. Stanford is also informed and believes
 25 and thereon alleges that at all times herein mentioned, each of the Contracting Defendants was
 26 acting within the course and scope of a joint venture with each of the other Contracting
 27 Defendants, and on that basis alone, each contracting Defendant owes a duty to hold Stanford
 28 harmless in respect of the breach of contract, negligence, or other legal theories underpinning

1 all of the Defendants' liabilities to Stanford herein.

2 6. Stanford is informed and believes and thereon alleges that at all times herein
 3 mentioned Defendants TRANS XPRESS LINE, INC., JERMAINE MARKEES TURNER, and
 4 DOES 21 through 40, inclusive (the "Non-Contracting Defendants") were the agents, servants,
 5 employers and/or employees of each of the other Non-Contracting Defendants and in doing the
 6 things hereinafter alleged were acting within the scope of such agency, service and/or
 7 employment and with the permission and consent of said Non-Contracting Defendants
 8 referenced in this paragraph. Stanford is also informed and believes and thereon alleges that at
 9 all times herein mentioned each and every one of the Non-Contracting Defendants was acting
 10 within the course and scope of a joint venture with each other and each of the other
 11 Non-Contracting Defendants, and on that basis alone, each said Defendant owes a duty to hold
 12 Stanford harmless in respect of the negligence or other legal theories underpinning all of the
 13 Defendants' liabilities to Stanford herein.

14 7. Stanford is informed and believes and thereon alleges that at all times herein
 15 mentioned the Contracting Defendants, and each of them, were engaged in the business of
 16 interstate and intrastate transportation of goods, and owned, operated, controlled, drove, and
 17 managed vehicles for that purpose. Said Contracting Defendants, and each of them, at all times
 18 relevant were aware that their failure to professionally and competently perform the services
 19 they were contracted to perform, i.e., to safely transport from Lemont, Illinois to Plaintiff's
 20 facility in the City of Menlo Park, County of San Mateo, California, a device used in a particle
 21 accelerator, could and would result in significant financial losses to Stanford. Said device is a
 22 series of magnets designed to periodically laterally deflect ('wiggle') a beam of charged
 23 particles, such as electrons. Said device is colloquially and will hereafter be referred to as
 24 "wiggler." Stanford reasonably relied at all times relevant upon said Contracting Defendants to
 25 provide transportation services in a competent manner so as to safely transport the "wiggler"
 26 from Illinois to California. However, said Contracting Defendants breached this contract and
 27 obligation, thus causing the "wiggler" to be damaged en route to California, resulting in the
 28 damages herein claimed.

1 8. Stanford is further informed and believes and thereon alleges that the
 2 Non-Contracting Defendants and each of them, were engaged in the business of interstate and
 3 intrastate transportation of goods, and owned, operated, controlled, drove, and managed
 4 vehicles for that purpose. Said Non-Contracting Defendants owed a legal duty to others,
 5 including Stanford, to conduct themselves properly and at all times within the law and not to
 6 conduct themselves negligently, carelessly, recklessly, or otherwise so as to cause harm to
 7 others, including Stanford and its property interests as set forth herein. However, despite such
 8 duty, said Non-Contracting defendants operated their vehicle negligently, carelessly, recklessly,
 9 and otherwise wrongfully, so as to directly and legally cause Stanford's losses as herein
 10 claimed.

11 9. Stanford is informed and believes and thereon alleges that at all times herein
 12 mentioned the Contracting Defendants undertook to transport the "wiggler" from Lemont,
 13 Illinois to Plaintiff's facility in the City of Menlo Park, County of San Mateo, California. On or
 14 about January 24, 2017, Defendants' vehicle was involved in an accident (hereinafter referred
 15 to as "the first accident") in the State of New Mexico, resulting in damage to the "wiggler" and
 16 resulting in Plaintiff's losses as herein claimed.

17 10. Stanford is informed and believes and thereon alleges that at all times herein
 18 mentioned the Non-Contracting Defendants, and each of them, were operating their vehicle on
 19 a public roadway in the State of New Mexico when said Non-Contracting Defendants were
 20 involved in a subsequent accident (hereinafter referred to as "the second accident") near the
 21 location of the first accident involving the Contracting Defendants' vehicle, resulting in further
 22 damage to and the near destruction of the "wiggler" being transported by the Contracting
 23 Defendants as above-described.

24 11. As a direct and legal result of the negligence, carelessness, and recklessness of
 25 Defendants, and each of them, Plaintiff Stanford has been injured by way of damage to and the
 26 near destruction of the scientific property known as the "wiggler," for the cost of the
 27 transportation of the "wiggler" from the scene of the accidents in New Mexico to a repair
 28 facility in Lemont, Illinois, for the repair of the said "wiggler," and for other damages

1 according to proof.

2 12. As a further direct and legal result of the negligence, carelessness and
3 recklessness of Defendants, and each of them, and the resulting losses and damages as
4 hereinbefore described, Stanford is entitled to pre-judgment interest at the legal rate according
5 to proof and in an amount to be determined, and is also entitled to attorney's fees as allowable
6 by law and by contract.

7 13. Venue and jurisdiction properly lies within the County of San Mateo, State of
8 California as the contract for delivery of the "wiggler" to Stanford's facility in the City of
9 Menlo Park, County of San Mateo, State of California was entered into in the City of
10 Menlo Park, County of San Mateo, State of California. The Superior Court of the State of
11 California is the proper jurisdiction and forum for the determination of the rights and liabilities
12 of the parties herein.

13 **WHEREFORE**, Stanford prays for judgment as hereinafter set forth.

14 **FIRST CAUSE OF ACTION**

15 **Breach of Contract against Contracting Defendants:**

16 TRUMP CARD, INC. (a California corporation and LLC); TIFLOR
17 TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO);
18 TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD
19 CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a
California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown);
MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT
CORPORATION (a California corporation); BIRKIRAN SINGH (a California resident);
RAPID TRUCKING, LLC (a California corporation and LLC); and DOES 1 through 20,
inclusive

21 14. Plaintiff re-alleges and incorporates by this reference as though fully set forth
22 herein the allegations of paragraphs 1-13, inclusive.

23 15. Plaintiff and the "Contracting Defendants", including TRUMP CARD, INC. (a
24 California corporation and LLC); TIFLOR TRANSPORTATION, LLC (a California LLC)
25 (dba TRUMP CARD SAN DIEGO); TRUMP CARD HOLDINGS, INC. (a California
26 corporation and LLC); TRUMP CARD CALIFORNIA, INC. (a California corporation and
27 LLC); SIMPATICO, INC. (a California corporation); MAGNATE HOLDINGS, LLC
(corporate status unknown); MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN

1 TRANSPORT CORPORATION (a California corporation); BIRKIRAN SINGH (a California
2 resident); RAPID TRUCKING, LLC (a California corporation and LLC); and DOES 1 through
3 20, inclusive, engaged in a contractual relationship by which Defendants agreed to faithfully,
4 professionally, reasonably, safely, and in good faith and fair dealing transport a device known
5 as a "wiggler" from Lemont, Illinois to Plaintiff's facility in Menlo Park, California. Plaintiff
6 fulfilled all of the requirements of the above-mentioned contract. However, on or about
7 January 24, 2017, Defendants, and each of them, breached their duty to faithfully,
8 professionally, reasonably, safely, and in good faith and fair dealing perform the referenced
9 services in a competent manner.

10 16. Defendants' breach of the contract above-described has resulted in property and
11 other damages to Plaintiff, according to proof.

12 17. The contract between Stanford and the "Contracting Defendants", and each of
13 them, may potentially call for an award of attorney's fees and costs in the event of a breach or
14 other act, error, and/or omission. Therefore, Stanford prays for an award of attorney's fees,
15 interest, and costs as against all Defendants herein mentioned.

16 18. Stanford does not attach a copy of its contractual arrangements with the
17 Contracting Defendants herein as the same may be subject to privacy rights. However, a copy
18 of said written contractual arrangements will be made the subject of proper discovery and, in
19 any event, Stanford is informed and believes and thereon alleges that Defendants have such
20 copies in their possession.

21 19. Stanford is informed and believes and thereon alleges that the value of its claims
22 in this matter well exceed the jurisdictional minimum of this Court (thus the matter is filed in
23 "unlimited" jurisdiction).

24 WHEREFORE, Stanford prays for judgment as hereinafter set forth on multiple causes
25 of action (see *infra*).

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SECOND CAUSE OF ACTION

Negligence against all Defendants

3 Plaintiff re-alleges and incorporates by reference as though fully set forth herein the
4 allegations of paragraphs 1-13, inclusive.

5 20. On or about January 24, 2017, Defendants, and each of them, negligently,
6 carelessly, and recklessly owned, operated, controlled, and drove their vehicles so as to cause
7 two separate single-vehicle accidents, both of which caused damage to Plaintiff's property,
8 namely the "wiggler". Contracting Defendants TRUMP CARD, INC. (a California corporation
9 and LLC); TIFLOR TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN
10 DIEGO); TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP
11 CARD CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a
12 California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown);
13 MAGNATE WORLDWIDE, LLC (an Illinois LLC) and Does 1 – 5, inclusive, were further
14 negligent in the subcontracting of said contract for transport of the "wiggler" to Contracting
15 Defendants GHUMAN TRANSPORTATION CORP. (a California corporation); BIRKIRAN
16 SINGH (a California resident); RAPID TRUCKING (a California corporation and LLC); and
17 Does 6 – 10, inclusive. Contracting Defendants TRUMP CARD, INC. (a California corporation
18 and LLC); TIFLOR TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN
19 DIEGO); TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP
20 CARD CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a
21 California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown);
22 MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORTATION
23 CORPORATION (a California corporation); RAPID TRUCKING, LLC (a California
24 corporation and LLC); and Does 6 – 10, inclusive and each of them, were further negligent in
25 the hiring of Defendant BIRKIRAN SINGH to operate the vehicle which was to transport the
26 magnetic "wiggler" from Illinois to California, in that said Contracting Defendants, and each
27 of them, knew or should have known that Defendant SINGH did not possess the class of
28 driver's license required to lawfully operate the vehicle to which he was assigned, and was

1 unable to safely operate said vehicle. Non-Contracting Defendants TRANS EXPRESS, LINE,
2 INC. (a California corporation); and DOES 21 through 30, inclusive, were further negligent in
3 the hiring of Defendant JERMAINE MARKEES TURNER in that said Non-Contracting
4 Defendants knew, or should have known, that Defendant JERMAINE MARKEES TURNER
5 was unable to safely operate the vehicle involved in the second accident.

6 21. As a legal and proximate result of the negligence, recklessness, and carelessness
7 of Defendants, and each of them, Plaintiff has suffered damage to and the near destruction of a
8 magnetic device known as the "wiggler". These multiple breaches of duties to Plaintiff have
9 resulted in Stanford's damages referenced herein.

10 WHEREFORE, Stanford prays for judgment as hereinafter set forth on multiple causes
11 of action (see *infra*).

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as
14 follows:

15 1. For all consequential breach of contract and tort damages according to proof at
16 the time of trial (which damages well exceed the "unlimited jurisdiction" threshold of this
17 Court);

18 2. For pre-judgment interest according to proof at the time of trial;

19 3. For attorney's fees according to proof at the time of trial;

20 4. For costs of suit incurred herein; and,

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5. For such other and further relief as the Court may deem just and proper under the circumstances.

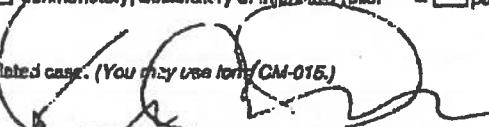
Respectfully Submitted,

BOWER • von RAESFELD

Dated: December 13, 2017

by:

Keith C. Bower
Attorney for Defendant
THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): KEITH C. BOWER, ESQ. Bower von Retschafel 900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050 TELEPHONE NO. 408-261-1200 FAX NO. 408-985-9042 SRN: 135243		CM-010 FOR COURT USE ONLY ENDORSED FILED SAN MATEO COUNTY DEC 14 2017 Clerk of the Superior Court By <u>UNA FINAU</u> PROBITY CLERK												
ATTORNEY FOR (Name): STANFORD UNIVERSITY SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Southern Branch; Hall of Justice and Records CASE NAME: THE BOARD OF TRUSTEES OF THE LEAND STANFORD JUNIOR UNIVERSITY v. TRUMP CARD, INC., et al.		17CIV05727 JUDGE: DOJ:												
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited <input type="checkbox"/> Limited (Amount demanded or demanded to exceed \$25,000) (Amount \$25,000 or less)		Complex Case Designation <input type="checkbox"/> COUNTER <input type="checkbox"/> JOINDER Filed with first appearance by defendant (Cal. Rules of Court, rule 3.102)												
<i>Items 1-6 below must be completed (see instructions on page 2).</i>														
<p>1. Check one box below for the case type that best describes this case:</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorists (46) </td> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Contract <input checked="" type="checkbox"/> Breach of contract/warranty (68) <input type="checkbox"/> Rule 3.740 collections (69) <input type="checkbox"/> Other collections (93) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) </td> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.463) <input type="checkbox"/> Antitrust/Trade regulation (68) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex cases types (41) </td> </tr> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> Other PIP/DWD (Personal Injury/Property Damage) /Wrongful Death) Tort <input type="checkbox"/> Asbestos (44) <input type="checkbox"/> Product liability (22) <input type="checkbox"/> Medical malpractice (46) <input type="checkbox"/> Other PIP/DWD (29) </td> <td style="vertical-align: top;"> <input type="checkbox"/> Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (83) <input type="checkbox"/> Other real property (26) </td> <td style="vertical-align: top;"> <input type="checkbox"/> Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) </td> </tr> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> Non-PIP/DWD (Other) Tort <input type="checkbox"/> Business for/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PIP/DWD tort (46) </td> <td style="vertical-align: top;"> <input type="checkbox"/> Unlawful Database <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (22) <input type="checkbox"/> Drugs (28) </td> <td style="vertical-align: top;"> <input type="checkbox"/> Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) </td> </tr> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> Employment <input type="checkbox"/> Wrongful termination (26) <input type="checkbox"/> Other employment (16) </td> <td style="vertical-align: top;"> <input type="checkbox"/> Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (26) </td> <td style="vertical-align: top;"> <input type="checkbox"/> Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (49) </td> </tr> </table>			<input type="checkbox"/> Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorists (46)	<input type="checkbox"/> Contract <input checked="" type="checkbox"/> Breach of contract/warranty (68) <input type="checkbox"/> Rule 3.740 collections (69) <input type="checkbox"/> Other collections (93) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37)	<input type="checkbox"/> Provisionally Complex Civil Litigation (Cal. 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<p>2. This case <input type="checkbox"/> is <input checked="" type="checkbox"/> not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:</p> <p>a. <input type="checkbox"/> Large number of separately represented parties d. <input type="checkbox"/> Large number of witnesses</p> <p>b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court</p> <p>c. <input type="checkbox"/> Substantial amount of documentary evidence f. <input type="checkbox"/> Substantial postjudgment judicial supervision</p>														
<p>3. Remedies sought (check all that apply): a. <input checked="" type="checkbox"/> monetary b. <input type="checkbox"/> nonmonetary; declaratory or injunctive relief c. <input type="checkbox"/> punitive</p>														
<p>4. Number of causes of action (specify): TWO</p>														
<p>5. This case <input type="checkbox"/> is <input checked="" type="checkbox"/> not a class action suit.</p>														
<p>6. If there are any known related cases, file and serve a copy of related case. (You may use form CM-015.)</p>														
<p>Date: December 14, 2017</p> <p>KEITH C. BOWER, ESQ. (TYPE OR PRINT NAME)</p>		 <small>NOTICE</small> <p>Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.</p> <p>File this cover sheet in addition to any cover sheet required by local court rules.</p> <p>If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.</p> <p>Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.</p>												

CM-010

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 8.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money were acquired on credit. A collections case does not include an action seeking the following: (1) tort damages; (2) punitive damages; (3) recovery of real property; (4) recovery of personal property; or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by checking the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a *joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.*

Auto Tort
Auto (20)-Personal Injury/Report;
 -Death/Wrongful Death
 -Uninsured Motorist (48) (If the case involves an uninsured motorist claim subject to arbitration, check this box instead of Auto)

Other PUP/DWD (Personal Injury/Property Damage/Wrongful Death) Tort

Auto-bodily (14)
 -Abusive Property Damage
 -Abusive Personal Injury/
 Wrongful Death
Product Liability (not asbestos or
 toxic/environmental) (24)
Medical Malpractice (45)
 -Medical Malpractice-
 Physicians & Surgeons
 -Other Professionals: Health Care
 -Malpractice
Other PUP/DWD (23)
 -Product Liability (e.g., slip
 and fall)
 -Intentional Bodily Injury/PC 471
 (e.g., assault, vandalism)
 -Intentional Infliction of
 Emotional Distress
 -Negligent Infliction of
 Emotional Distress
 -Other PUP/DWD

Non-PUP/DWD (Other) Tort
Business Tort/Unfair Business
Practices (97)
Civil Rights (e.g., discrimination,
 hate crime) (not civil
 harassment) (28)
Defamation (e.g., libel, slander, etc.)
 (13)
Fraud (16)
Intellectual Property (18)
Professional Malpractice (25)
 -Legal Malpractice
 -Other Professional Malpractice
 (not medical or legal)
Other Non-PUP/DWD Tort (35)
Employment
 -Wrongful Termination (32)
 -Other Employment (15)

CASE TYPES AND EXAMPLES

Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court Rule 3.400-3.403)
Breach of Contract/Warranty (98)	Antitrust/Trade Regulation (33)
Breach of Lease	Construction: Defect (10)
-Contract (not unlawful detainer or wrongful eviction)	Claims Involving Mass Tort (40)
Contract/Warranty Breach-Seller	Securities Litigation (25)
-Plaintiff (not fraud or negligence)	Environmental/Torts Tort (80)
Negligent Breach of Contract/	Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)
Warranty	Enforcement of Judgment
Other Breach of Contract/Warranty	-Enforcement of Judgment (20)
Collections (e.g., money owed, open	-Abuse of Judgment (Out of County)
lock accounts) (98)	-Confession of Judgment (non- domestic relations)
Collection Case-Seller Plaintiff	-Bill of Sale Judgment
Other Promissory Note/Collections	-Administrative Agency Award (not unpaid taxes)
Case	-Position/Certification of Entry of Judgment on Unpaid Taxes
Insurance Coverage (not provisionally	-Other Enforcement of Judgment Case
complex) (16)	Miscellaneous Civil Complaint
Auto Subrogation	RICO (77)
Other Coverage	-Other Complaint (not specified above) (48)
Other Contract (37)	-Declaratory Relief Only
Contractual Fraud	-Injunctive Relief Only (non- injunction)
Other Contract Dispute	-Mechanics Lien
Real Property	-Other Commercial Complaint Case (non-tortious-complex)
Eminent Domain/Interest Condemnation (14)	-Other Civil Complaint (non-tortious-complex)
Wrongful Eviction (35)	Miscellaneous Civil Petition
Other Real Property (e.g., quiet title) (32)	-Partnership and Corporate Governance (21)
Writ of Possession of Real Property	-Other Petition (not specified above) (45)
Mortgage Foreclosure	-Civil Harassment
Quiet Title	-Workplace Violence
Other Real Property (not eminent domain, land division, or foreclosure)	-Elder/Dependent Adult Abuse
Unlawful Detainer	-Election Contest
Commercial (31)	-Petition for Name Change
Residential (32)	-Petition for Relief From Late Claim
Drug: (28) (If the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)	-Other Civil Petition
Judicial Review	Page 2 of 8
Asset Forfeiture (25)	
Petition Re: Arbitration Award (11)	
Writ of Mandate (22)	
Writ-Administrative Mandamus	
Writ-Mandamus on Limited Court Case	
Writ-Other Limited Court Case Review	
Other Judicial Review (20)	
Review of Health Officer Order	
Notice of Appeal-Labor Commissioner Appeal	

NOTICE OF CASE MANAGEMENT CONFERENCE

The Board of Trustee of
The Leland Stanford Junior University

FILEDCase No: 17CIV05727

vs.

Trump Care, Inc et al

DEC 14 2017

Date: APR 20 2018

Clerk of the Superior Court

Time 9:00 a.m.

DANIEL CLEARY

Dept. 21

-on Tuesday & Thursday

Dept. 21

-on Wednesday & Friday

17-CIV-05727

NCMC

Notice of Case Management Conference
876900

You are hereby given notice of your Case Management Conference. The date, time and department have been written above.

1. In accordance with applicable California Rules of the Court and local Rules 2.3(d)1-4 and 2.3(m), you are hereby ordered to:
 - a) Serve all named defendants and file proofs of service on those defendants with the court within 60-days of filing the complaint (CRC 201.7).
 - b) Serve a copy of this notice, Case Management Statement and ADR Information Sheet on all named parties in this action.
 - c) File and serve a completed Case Management Statement at least 15-days before the Case Management Conference [CRC 212(g)]. Failure to do so may result in monetary sanctions.
 - d) Meet and confer, in person or by telephone, to consider each of the issues identified in CRC 212(f) no later than 30-days before the date set for the Case Management Conference.
2. If you fail to follow the orders above, you are ordered to show cause why you should not be sanctioned. The Order to Show Cause hearing will be at the same time as the Case Management Conference hearing. Sanctions may include monetary, evidentiary or issue sanctions as well as striking pleadings and/or dismissal.
3. Continuances of Case Management Conferences are highly disfavored unless good cause is shown.
4. Parties may proceed to an appropriate dispute resolution process ("ADR") by filing a Stipulation to ADR and Proposed Order (see attached form). If plaintiff files a Stipulation to ADR and Proposed Order electing to proceed to judicial arbitration, the Case Management Conference will be taken off the court calendar and the case will be referred to the Arbitration Administrator. If plaintiffs and defendants file a completed stipulation to another ADR process (e.g., mediation) 10-days prior to the first scheduled Case Management Conference, the Case Management Conference will be continued for 90-days to allow parties time to complete their ADR session. The court will notify parties of their new Case Management Conference date.
5. If you have filed a default or a judgment has been entered, your case is not automatically taken off Case Management Conference Calendar. If "Does", "Roes," etc. are named in your complaint, they must be dismissed in order to close the case. If any party is in bankruptcy, the case is stayed only as to that named party.
6. You are further ordered to appear in person* (or through your attorney of record) at the Case Management Conference noticed above. You must be thoroughly familiar with the case and fully authorized to proceed.
7. The Case Management judge will issue orders at the conclusion of the conference that may include:
 - a) Referring parties to voluntary ADR and setting an ADR completion date;
 - b) Dismissing or severing claims or parties;
 - c) Setting a trial date.
8. The Case Management judge may be the trial judge in this case.

For further information regarding case management policies and procedures, see the court's website at: www.sanmateocourt.org

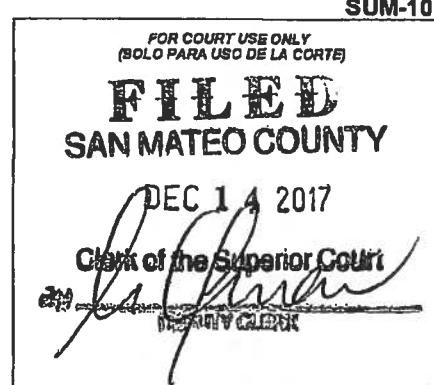
*Telephonic appearances at case management conferences are available by contacting CourtCall, LLC, an independent vendor, at least five business days prior to the scheduled conference (see attached CourtCall information).

EXHIBIT A

SUMMONS
(CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and (AVISO AL DEMANDADO): LLC; SEE ATTACHMENT SUM-200(A) FOR ADDITIONAL DEFENDANTS

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF (LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD JUNIOR UNIVERSITY



NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/seithelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/seithelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. (AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lee la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda deschar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court of California, County of San Mateo

400 County Center

Redwood City, California 94063

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower von Reasfeld

900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

DATE: **DEC 14 2017**
(Fecha)

Clerk, by **RODINA M. CATALANO** (Secretario)

408-261-1200

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010).)

NOTICE TO THE PERSON SERVED: You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify):

3. on behalf of (specify):

under: CCP 416.10 (corporation)

CCP 416.20 (defunct corporation)

CCP 416.40 (association or partnership)

other (specify):

CCP 416.60 (minor)

CCP 416.70 (conservatee)

CCP 416.90 (authorized person)

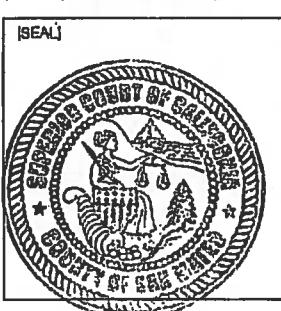
4. by personal delivery on (date):

17-CIV-05727

SUM

Summons Issued / Filed

876884



SUM-200(A)

SHORT TITLE: STANFORD UNIVERSITY v. TRUMP CARD, INC., et al.	CASE NUMBER:
--	--------------

INSTRUCTIONS FOR USE

- This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

Plaintiff Defendant Cross-Complainant Cross-Defendant

TIFLOR TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California corporation; MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATE WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT CORPORATION (a California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING LLC (a California corporation and LLC); TRANS XPRESS LINE, INC. (a California corporation); JERMAINE MARKEES TURNER (a California resident); and DOES 1 to 50, inclusive

Page 1 of 1
Page 1 of 1

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 21 2018 Clerk of the Superior Court S. [Signature] COURT CLERK
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
f. other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
Birkiran Singh (A California Resident)
4. Address where the party was served:
2550 East Seville Ave, Anaheim, CA 92806
5. I served the party
 - b. by substituted service. On 2/16/2018 at 8:33 am I left the documents listed in item 2 with or in the presence of:
John Doe (refused name) / Occupant
 - (2) (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
 - (5) I attached a declaration of diligence stating actions taken first to attempt personal service.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - a. as an individual defendant.

17-CIV-05727
PSS
Proof of Service by SUBSTITUTED SERVICE of
989799



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

7. Person who served papers

a. Name: Bryan Canas
Firm: County Process Service, Inc.
b. Address: 31 E. Julian Street, San Jose, CA 95112
c. Telephone number: (408) 297-6070
d. The fee for the service was:
e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 1603
(iii) County: Riverside

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/20/18

Bryan Canas

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV C5727
DECLARATION OF DUE DILIGENCE	Ref. No. or File No.:

1. I Bryan Canas, am at least 18 years of age and not a party to this action.

2. Documents to be served:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. Party to be served:

Birkiran Singh (A California Resident), 2550 East Seville Ave, Anaheim, CA 92806

4. Details of diligence:

02/07/2018 8:05 PM Attempted Service. No answer.
 02/08/2018 7:13 AM Attempted Service. No answer.
 02/09/2018 1:24 PM Attempted Service. Per John Doe (Middle Eastern Male approx. 70yrs old), he stated that subject does not live here. He stated that subject bought a home in Moreno Valley and provided subject's phone number 714-452-7113.
 02/14/2018 12:00 PM Received instructions from client/attorney to drop serve at this address no matter what any occupant claims about subject living here or not.
 02/16/2018 8:33 AM Attempted Service - I was informed the defendant does not reside here. Server drop/sub-served documents, per client instruction, to occupant John Doe (refused name).

5. Person attesting to diligence:

Name: Bryan Canas
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
 I am a registered California process server: Independent contractor
 Registration No.: 1603
 County: Riverside

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/20/18

Bryan Canas

(PRINTED NAME)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING	
Ref. No. or File No.:	

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.

2. Documents mailed:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/16/2018
 Location: San Jose, CA
 Addressed: Birkiran Singh (A California Resident), 2550 East Seville Ave, Anaheim, CA 92806

4. Person performing mailing:

Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/21/18

Michael R. Mezzetti

(PRINTED NAME)



(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050		FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 21 2018 Clerk of the Superior Court DRAFT
TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
f. other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
- a. Party served:
Ghuman Transport Corporation (a California Corporation)
- Address where the party was served:
7050 Melrose St, Unit C, Buena Park, CA 90621
- I served the party
b. by substituted service. On 2/16/2018 at 8:06 am I left the documents listed in item 2 with or in the presence of:
Agent, Umair S. Khan, President, by serving Gurpreet Khan, occupant / Authorized To Accept
Description: Age: 40, Sex: m, Race/Skin Color: M.E., Height: 5'6", Weight: 150, Hair: black, Glasses: n
 - (2) (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
 - (5) I attached a declaration of diligence stating actions taken first to attempt personal service.
- The "Notice to the Person Served" (on the summons) was completed as follows:
d. On behalf of: Ghuman Transport Corporation (a California Corporation) under the following Code of Civil Procedure section:
416.10 (corporation)

17-CIV-05727
PSS
Proof of Service by SUBSTITUTED SERVICE of
989540



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

7. Person who served papers

- a. Name: Bryan Canas
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 1603
(iii) County: Riverside

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/20/18

Bryan Canas

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF DUE DILIGENCE	

1. I Bryan Canas, am at least 18 years of age and not a party to this action.

2. Documents to be served:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. Party to be served:

Ghuman Transport Corporation (a California Corporation), 7050 Melrose St Unit C, Buena Park, CA 90621

4. Details of diligence:

02/08/2018 7:45 PM Attempted Service. No answer.
 02/09/2018 7:33 AM Attempted Service. No answer.
 02/11/2018 10:30 AM Attempted Service. Server told by occupant that there is no one at given address who is affiliated with the company and the agent is unknown.
 02/14/2018 12:00 PM Received instructions from client/attorney to drop serve at this address no matter what any occupant claims about subject living here or not.
 02/16/2018 8:06 AM Attempted Service - I was informed the agent is unknown at this address and there is no one here affiliated with the company. Drop/sub-service completed, per client instruction, by serving Gurpreet Khan, occupant of residence.

5. Person attesting to diligence:

Name: Bryan Canas
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
 I am a registered California process server: independent contractor
 Registration No.: 1603
 County: Riverside

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/20/18

Bryan Canas

(PRINTED NAME)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING		Ref. No. or File No.:

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.

2. Documents mailed:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/16/2018
Location: San Jose, CA
Addressed: Ghuman Transport Corporation (a California Corporation), 7050 Melrose St
Unit C, Buena Park, CA 90621

4. Person performing mailing:

Name: Michael R. Mezzetti
Firm: County Process Service, Inc.
Address: 31 E. Julian Street, San Jose, CA 95112
Telephone Number: (408) 297-6070

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

2/21/18
Date:



Michael R. Mezzetti

(PRINTED NAME)

(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 15 2018 <i>Clerk of the Superior Court</i> BY FAX
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		CASE NUMBER 17 CIV 05727
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		Ref. No. or File No.:
PROOF OF SERVICE OF SUMMONS		

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
f. other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
- a. Party served:
Jermaine Markees Turner (A California Resident)
- Address where the party was served:
330 "T" Street, Bakersfield, CA 93304
- I served the party
b. by substituted service. On 2/9/2018 at 12:30 pm I left the documents listed in item 2 with or in the presence of:
Ruthina Doe (refused last name) / Co-Occupant
Description: Age: 51+, Sex: f, Race/Skin Color: A.A., Height: 5'8", Weight: 170, Hair: black, Glasses: n

(2) (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
(4) a declaration of mailing is attached.
(5) I attached a declaration of diligence stating actions taken first to attempt personal service.
- The "Notice to the Person Served" (on the summons) was completed as follows:
d. On behalf of: Jermaine Markees Turner (A California Resident)
under the following Code of Civil Procedure section:
416.10 (corporation)

17-CIV-05727
PSS
Proof of Service by SUBSTITUTED SERVICE of
980815



PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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7. Person who served papers

- a. Name: Gina A. Calvillo
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 722
(iii) County: Kern County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/18/18

Gina A. Calvillo

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727 BY FAX
DECLARATION OF DUE DILIGENCE	

1. I Gina A. Calvillo, am at least 18 years of age and not a party to this action.

2. Documents to be served:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. Party to be served:

Jermaine Markees Turner (A California Resident), 330 "T" Street, Bakersfield, CA 93304

4. Details of diligence:

02/07/2018 8:30 PM Attempted Service. No answer.

02/08/2018 8:30 AM Attempted Service. No answer.

02/09/2018 12:30 PM Attempted Service - I was informed the defendant was not in. I subserved co-occupant Ruthina Doe (refused last name).

5. Person attesting to diligence:

Name: Gina A. Calvillo

Firm: County Process Service, Inc.

Address: 31 E. Julian Street, San Jose, CA 95112

Telephone Number: (408) 297-6070

I am a registered California process server: independent contractor
Registration No.: 722

County: Kern County

6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/13/18

Gina A. Calvillo

(PRINTED NAME)

(SIGNATURE)

Page 1 of 1

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING	

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.
2. Documents mailed:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/12/2018
 Location: San Jose, CA
 Addressed: Jermaine Markees Turner (A California Resident), 330 "T" Street,
 Bakersfield, CA 93304

4. Person performing mailing:

Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/13/18

Michael R. Mezzetti

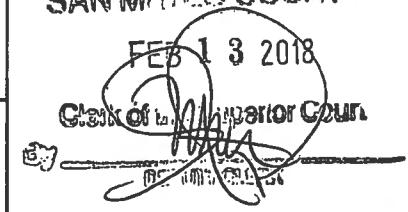
(PRINTED NAME)



(SIGNATURE)

4/120
cmw

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 13 2018 Clerk of Superior Court 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
Landstar System, Inc, as Doe 1
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
Agent, CT Corporation System by serving Daisy Montenegro / Authorized To Accept
4. Address where the party was served:
818 W Seventh St, Ste 930, Los Angeles, CA 90017
5. I served the party
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 1:50 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - b. as the person sued under the fictitious name of:
as Doe 1
 - d. On behalf of: Landstar System, Inc, as Doe 1
under the following Code of Civil Procedure section:
416.10 (corporation)

17-CIV-05727
PSP
Proof of Service by PERSONAL SERVICE of
976210



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

7. Person who served papers

a. Name: Carlos Canas
Firm: County Process Service, Inc.
b. Address: 31 E. Julian Street, San Jose, CA 95112
c. Telephone number: (408) 297-6070
d. The fee for the service was:
e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 4571
(iii) County: Los Angeles

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/16

Carlos Canas

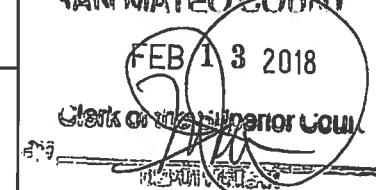
(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

H20
CMB

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 13 2018 Clerk of the Superior Court 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
f. other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. Party served:
Magnate Holdings, LLC (corporate status unknown)

b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
C/O Erich Wise, Esq. / Authorized To Accept
4. Address where the party was served:
One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Magnate Holdings, LLC (corporate status unknown)
under the following Code of Civil Procedure section:
415.95 (business organization, form unknown)

17-CIV-05727
PSP
Proof of Service by PERSONAL SERVICE of
976177



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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7. Person who served papers

- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/1/18

Andrea Gage

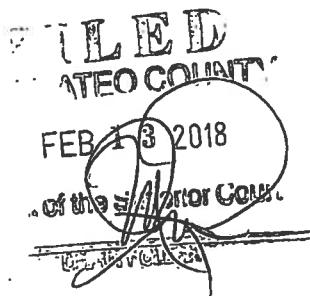
(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

4/20 CIVL

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050		FOR COURT USE ONLY 
TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
f. other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. Party served:
Magnate Worldwide, LLC (an Illinois LLC)

b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
C/O Erich Wise, Esq. / Authorized To Accept
4. Address where the party was served:
One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Magnate Worldwide, LLC (an Illinois LLC)
under the following Code of Civil Procedure section:
other: LLC

17-CIV-05727
PSP
Proof of Service by PERSONAL SERVICE of
976202



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University	CASE NUMBER:
DEFENDANT: Trump Card, Inc., et al	17 CIV 05727

7. Person who served papers

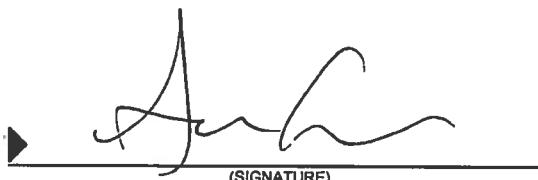
a. Name: Andrea Gage
Firm: County Process Service, Inc.
b. Address: 31 E. Julian Street, San Jose, CA 95112
c. Telephone number: (408) 297-6070
d. The fee for the service was:
e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 1745
(iii) County: Riverside County

3. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

Andrea Gage

(NAME OF PERSON WHO SERVED PAPERS)

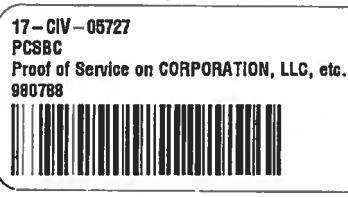


(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY FILED SAN MATEO COUNT FEB 15 2018 <i>Chair of the Superior Court</i> RECEIVED
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
Pride Logistics as Doe 2
4. Address where the party was served:
1776 Hawaii Circle, Costa Mesa, CA 92626
5. I served the party
 - b. by substituted service. On 2/11/2018 at 2:36 pm I left the documents listed in item 2 with or in the presence of:
Agent, Richard Thorne, by serving John Doe (refused name), Apparently in Charge / Authorized To Accept
Description: Age: 30, Sex: m, Race/Skin Color: cauc., Height: 6', Weight: 190, Hair: brown, Glasses: n
 - (3) (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
 - (5) I attached a declaration of diligence stating actions taken first to attempt personal service.



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
---	------------------------------

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- b. as the person sued under the fictitious name of:
as Doe 2
- d. On behalf of: Pride Logistics as Doe 2
under the following Code of Civil Procedure section:
other: LLC

7. Person who served papers

- a. Name: Bryan Canas
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6073
- d. The fee for the service was:
- e. I am:
(3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1603
 - (iii) County: Riverside

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/13/18

Bryan Canas

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF DUE DILIGENCE	Ref. No. or File No.:

1. I Bryan Canas, am at least 18 years of age and not a party to this action.

2. Documents to be served:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. Party to be served:

Pride Logistics as Doe 2, 1776 Hawaii Circle, Costa Mesa, CA

4. Details of diligence:

02/08/2018 6:58 PM Attempted Service. No answer.
 02/09/2018 8:48 AM Attempted Service. No answer.
 02/11/2018 2:36 PM Attempted Service - I was informed the Agent was not in. He is the homeowner and it is his normal place of mailing. I subserved occupant of residence John Doe (refused name).

5. Person attesting to diligence:

Name: Bryan Canas
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
 I am a registered California process server: independent contractor
 Registration No.: 1603
 County: Riverside

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University	CASE NUMBER:
DEFENDANT: Trump Card, Inc., et al	17 CIV 05727

6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/13/18

Bryan Canas

(PRINTED NAME)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050		FOR COURT USE ONLY
TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727	
DECLARATION OF MAILING		Ref. No. or File No.:

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.
2. Documents mailed:
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/13/2018
 Location: San Jose, CA
 Addressed: Pride Logistics as Doe 2, 1776 Hawaii Circle, Costa Mesa, CA

4. Person performing mailing:

Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/15/18

Michael R. Mezzetti

(PRINTED NAME)



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 26 2018 Clerk of the Superior Court By <i>[Signature]</i> DEPUTY CLERK BY FAX
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		CASE NUMBER: 17 CIV 05727
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		Ref. No. or File No.:
PROOF OF SERVICE OF SUMMONS		

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. a. Party served:
 Rapid Trucking LLC (a California Corporation and LLC)
- b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 Agent, Gurtej S. Gill, President, by serving Cheryl Gibson, Accounting Manager / Authorized To Accept
4. Address where the party was served:
 5822 Price Ave, Ste 104, McClellan Park, CA 95652
5. I served the party
 - b. by substituted service. On 2/13/2018 at 4:24 pm I left the documents listed in item 2 with or in the presence of:
 Agent, Gurtej S. Gill, President, by serving Cheryl Gibson, Accounting Manager / Authorized To Accept
 - (1) (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (4) a declaration of mailing is attached.
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Rapid Trucking LLC (a California Corporation and LLC) under the following Code of Civil Procedure section:
 416.10 (corporation)

17-CIV-05727
 PCSBC
 Proof of Service on CORPORATION, LLC, etc.
 997841



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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7. Person who served papers

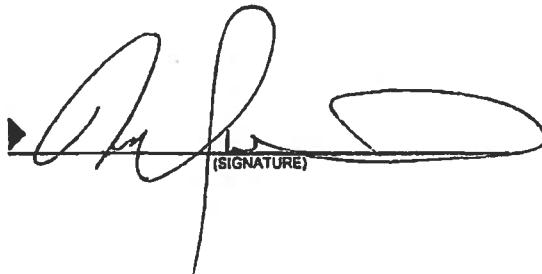
- a. Name: Nikifor Yakushchenko
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
(3) a registered California process server:
(I) independent contractor
(II) Registration No.: 2017-16
(iii) County: Sacramento

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/22/18

Nikifor Yakushchenko

(NAME OF PERSON WHO SERVED PAPERS)


(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 90C Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City		
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al		CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING		Ref. No. or File No.:

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.
2. Documents mailed:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/14/2018
 Location: San Jose, CA
 Addressed: Agent, Gurtej S. Gill, President, by serving Cheryl Gibson, Accounting Manager / Authorized To Accept, 5822 Price Ave, Ste 104, McClellan Park, CA 95652

4. Person performing mailing:

Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070
5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/11/18

Michael R. Mezzetti

(PRINTED NAME)



(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY FEB 15 2018 <i>Clerk of the Superior Court</i> <i>CLERK'S OFFICE</i>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
 - other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
- a. Party served:
Simpatico, Inc. (a California Corporation)
- Address where the party was served:
462 Stevens Ave, Ste 303, Solano Beach, CA 92057
- I served the party
 - by substituted service. On 2/12/2018 at 8:52 am I left the documents listed in item 2 with or in the presence of: Agent, Gayle Mayfield - Venieris, by serving Donna Walker, receptionist / Authorized To Accept
 - (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - a declaration of mailing is attached.
- The "Notice to the Person Served" (on the summons) was completed as follows:
 - On behalf of: Simpatico, Inc. (a California Corporation
under the following Code of Civil Procedure section:
416.10 (corporation)

17-CIV-05727
 PCSBC
 Proof of Service on CORPORATION, LLC, etc.
 980800



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford
Junior University
DEFENDANT: Trump Card, Inc., et al

CASE NUMBER:
17 CIV 05727

7. Person who served papers

a. Name: Manuel Robles
Firm: County Process Service, Inc.
b. Address: 31 E. Julian Street, San Jose, CA 95112
c. Telephone number: (408) 297-6070
d. The fee for the service was:
e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 3346
(iii) County: San Diego

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/14/18

Manuel Robles

(NAME OF PERSON WHO SERVED PAPERS)

Manuel Robles

(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
DECLARATION OF MAILING	
Ref. No. or File No.:	

1. I, Michael R. Mezzetti, am at least 18 years of age and not a party to this action.

2. Documents mailed:

Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date

3. A true copy of the documents were sealed in an envelope and placed in the United States mail with First Class postage prepaid as follows:

Date: 2/13/2018
 Location: San Jose, CA
 Addressed: Simpatico, Inc. (a California Corporation, 462 Stevens Ave, Ste 303, Solano Beach, CA 92057

4. Person performing mailing:

Name: Michael R. Mezzetti
 Firm: County Process Service, Inc.
 Address: 31 E. Julian Street, San Jose, CA 95112
 Telephone Number: (408) 297-6070

5. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/15/18

Michael R. Mezzetti

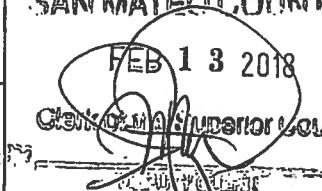
(PRINTED NAME)



(SIGNATURE)

4/120
CIVIL

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY  FEB 13 2018 SAN MATEO COUNTY, CALIFORNIA, SUPERIOR COURT
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. Party served:
 Tiflor Transportation, LLC (a California LLC) (dba Trump Card San Diego)
3. b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 C/O Erich Wise, Esq. / Authorized To Accept
4. Address where the party was served:
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
3. The "Notice to the Person Served" (on the summons) was completed as follows:
 - b. as the person sued under the fictitious name of:
 dba Trump Card San Diego
 - d. On behalf of: Tiflor Transportation, LLC (a California LLC) (dba Trump Card San Diego)
 under the following Code of Civil Procedure section:
 other: LLC

17-CIV-05727
 PSP
 Proof of Service by PERSONAL SERVICE of
 977114



PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
---	------------------------------

7. Person who served papers

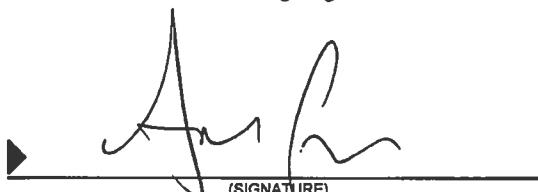
- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

Andrea Gage

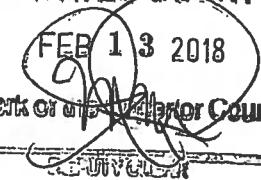
(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

4/10
CMB

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY FILED SAN MATEO COUNTY  Clerk of the Superior Court SAN MATEO COUNTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	CASE NUMBER: 17 CIV 05727
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	Ref. No. or File No.:
PROOF OF SERVICE OF SUMMONS	

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. **Party served:**
 Trump Card California, Inc. (a California corporation and LLC)
- b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 C/O Erich Wise, Esq. / Authorized To Accept
4. **Address where the party was served:**
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of: Trump Card California, Inc. (a California corporation and LLC)
 under the following Code of Civil Procedure section:
 416.10 (corporation)

17-CIV-05727
 PSP
 Proof of Service by PERSONAL SERVICE of
 977125



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
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T. Person who served papers

a. Name: Andrea Gage
Firm: County Process Service, Inc.
b. Address: 31 E. Julian Street, San Jose, CA 95112
c. Telephone number: (408) 297-6070
d. The fee for the service was:
e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 1745
(iii) County: Riverside County

E. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

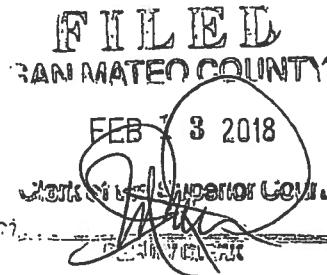
Andrea Gage

(NAME OF PERSON WHO SERVED PAPERS)


(SIGNATURE)

4/10
CIVIL

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raessfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS Ref. No. or File No.:	

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. **Party served:**
 Trump Card Holdings, Inc. (a California corporation and LLC)
- b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
 C/O Erich Wise, Esq. / Authorized To Accept
4. **Address where the party was served:**
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. **On behalf of:** Trump Card Holdings, Inc. (a California corporation and LLC)
 under the following Code of Civil Procedure section:
 416.10 (corporation)

17-CIV-05727
 PSP
 Proof of Service by PERSONAL SERVICE of
 976193



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
---	------------------------------

7. Person who served papers

- a. Name: Andrea Gage
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
 - (3) a registered California process server:
 - (i) independent contractor
 - (ii) Registration No.: 1745
 - (iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/16

Andrea Gage

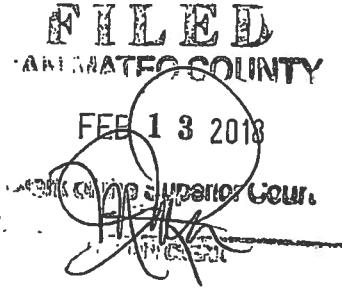
(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

4/20
CWA

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff	FOR COURT USE ONLY 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City	
PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
PROOF OF SERVICE OF SUMMONS	

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
 Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date; Letter Addressed to Erich Wise, Esq, Dated 02/06/18
3. a. **Party served:**
 Trump Card, Inc. (a California Corporation and LLC)
4. **Address where the party was served:**
 One World Trade Center, Ste 1800, Long Beach, CA 90831
5. I served the party
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/8/2018 at 12:52 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. **On behalf of:** Trump Card, Inc. (a California Corporation and LLC)
 under the following Code of Civil Procedure section:
 416.10 (corporation)

17-CIV-05727
 PSP
 Proof of Service by PERSONAL SERVICE of
 976223



Page 1 of 2

PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
---	------------------------------

7. Person who served papers

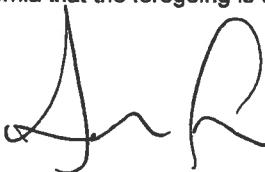
a. Name: Andrea Gage
Firm: County Process Service, Inc.
b. Address: 31 E. Julian Street, San Jose, CA 95112
c. Telephone number: (408) 297-6070
d. The fee for the service was:
e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 1745
(iii) County: Riverside County

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/9/18

Andrea Gage

(NAME OF PERSON WHO SERVED PAPERS)



(SIGNATURE)

4/20
Canc

POS-010

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY: Keith Bower, Esq (135243) Bower von-Raesfeld 900 Lafayette Street, Suite 706 Santa Clara, CA 95050 TELEPHONE NO.: (408) 261-1200 FAX NO.: (408) 985-9042 ATTORNEY FOR: Plaintiff</p>	<p>FOR COURT USE ONLY</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: 400 County Center CITY AND ZIP CODE: Redwood City, 94063 BRANCH NAME: Redwood City</p>	<p>FILED SAN MATEO COUNTY</p>
<p>PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al</p>	<p>CASE NUMBER: 17 CIV 05727</p>
<p>PROOF OF SERVICE OF SUMMONS</p>	
<p>Ref. No. or File No.:</p>	

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - f. other (specify documents):
Summons; Complaint; Civil Case Sheet; Plaintiff the Board of Trustees of the Leland Stanford Junior University's Amendment to Complaint Substituting True Names for Fictitious Names; Notice of Case Management Conference; Blank Stipulation to ADR; Blank Case Management Statement; Notice of Unavailability; Statement of Damages; Stipulation and Proposed Order Re Binding Arbitration Completion Date
3.
 - a. Party served:
Trans Xpress Line, Inc. (a California Corporation)
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made):
Agent, Amandeep Singh Rathore, President / Authorized To Accept
4. Address where the party was served:
6317 Grant Wood St, Bakersfield, CA 93312
5. I served the party
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party on 2/10/2018 at 1:18 pm
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - d. On behalf of Trans Xpress Line, Inc. (a California Corporation)
under the following Code of Civil Procedure section:
416.10 (corporation)

17-CIV-05727
PSP
Proof of Service by PERSONAL SERVICE of
101-1022



PLAINTIFF: The Board of Trustees of the Leland Stanford Junior University DEFENDANT: Trump Card, Inc., et al	CASE NUMBER: 17 CIV 05727
---	------------------------------

7. Person who served papers

- a. Name: Cheyenne B. Safley
Firm: County Process Service, Inc.
- b. Address: 31 E. Julian Street, San Jose, CA 95112
- c. Telephone number: (408) 297-6070
- d. The fee for the service was:
- e. I am:
(3) a registered California process server:
(i) independent contractor
(ii) Registration No.: 620
(iii) County: Kern Co.

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 3/11/18

Cheyenne B. Safley

(NAME OF PERSON WHO SERVED PAPERS)



CB Safley

(SIGNATURE)

4/20
Cmc

1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
4 Santa Clara, CA 95050
5 Telephone: 408/261-1200
6 Facsimile: 408/985-9042
7 kcb@bowervonraesfeld.com

8 Attorneys for Plaintiff
9 THE BOARD OF TRUSTEES OF THE
10 LELAND STANFORD JUNIOR UNIVERSITY

11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR
13 UNIVERSITY,

14 Plaintiff,

15 v.

16 TRUMP CARD, INC. (a California
17 corporation and LLC); TIFLOR
18 TRANSPORTATION, LLC (a California
19 LLC) (dba TRUMP CARD SAN DIEGO);
20 TRUMP CARD HOLDINGS, INC. (a
21 California corporation and LLC); TRUMP
22 CARD CALIFORNIA, INC. (a California
23 corporation and LLC); SIMPATICO, INC. (a
24 California corporation); MAGNATE
25 HOLDINGS, LLC (corporate status
unknown); MAGNATE WORLDWIDE,
LLC (an Illinois LLC); GHUMAN
TRANSPORT CORPORATION (a
California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
LLC (a California corporation and LLC);
TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
TURNER (a California resident); and DOES
1 to 50, inclusive;

26 Defendants.

FILED
SAN MATEO COUNTY

FEB 21 2018

Clerk of the Superior Court

Deputy Clerk

BY FAX

Case No.: 17 CIV 05727

PLAINTIFF'S AMENDMENT TO
COMPLAINT CORRECTING NAME
OF DOE 1

Complaint Filed: December 14, 2017
Trial Date: TBA FAXED

17-CIV-05727
ATC
Amendment to Complaint
989545



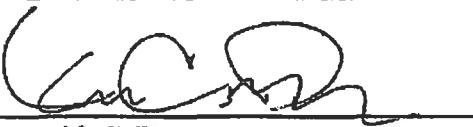
PLAINTIFF'S AMENDMENT TO COMPLAINT CORRECTING NAME OF DOE 1

EXHIBIT A

1 Plaintiff, THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR
2 UNIVERSITY hereby amends its amendment to complaint substituting true name for fictitious
3 name, filed February 6, 2018, to correct the name of DOE Defendant 1, sued herein as Landstar
4 System, Inc., to Landstar Express America, Inc.

5 Respectfully Submitted,

6 BOWER • von RAESFELD

7 by: 

8 Dated: February 20, 2018
9
10 Keith C. Bower
11 Attorney for Plaintiff
12 THE BOARD OF TRUSTEES OF THE
13 LELAND STANFORD JUNIOR
14 UNIVERSITY

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PLAINTIFF'S AMENDMENT TO COMPLAINT CORRECTING NAME OF DOE 1

Stanford University v. Trump Card, Inc., et al.
Santa Clara County Superior Court Case No.: 17-CIV-05727

PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within-entitled action. I am employed in Santa Clara County, California, with the law firm of Bower • von Raesfeld. My business address is 900 Lafayette Street, Suite 706, Santa Clara, California 95050.

On February 20, 2018, I served upon the interested party(ies) in the action the following document(s) described as:

PLAINTIFF'S AMENDMENT TO COMPLAINT CORRECTING NAME OF DOE 1

by placing the original true copies thereof enclosed in sealed envelopes addressed to:

SEE ATTACHED MAILING LIST

BY U.S. MAIL I deposited such envelope(s), with said postage thereon fully prepaid in the United States mail at a facility regularly maintained by the United States Postal Service at Santa Clara, California. I am "readily familiar" with the firm's practice of collecting and processing correspondence for mailing. Under this practice, the envelope is deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Santa Clara, California, in the ordinary course of business.

BY U.S. CERTIFIED MAIL I deposited such envelope(s), with said postage thereon fully prepaid in the United States mail, Certified Mail, at a facility regularly maintained by the United States Postal Service at Santa Clara, California. I am "readily familiar" with the firm's practice of collecting and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Santa Clara, California, in the ordinary course of business.

RETURN RECEIPT REQUESTED, U.S. MAIL

WITH CERTIFICATE OF MAILING A certificate of mailing was obtained from the United States Post Office evidencing the mailing referenced above.

BY FEDERAL EXPRESS I caused such envelope(s) to be placed for FedEx collection and delivery at Santa Clara, California. I am "readily familiar" with the firm's practice of collecting and processing correspondence for FedEx mailing. Under the practice it would be deposited with the FedEx Office on that same day with instructions for overnight delivery, fully prepaid, at Santa Clara, California, in the ordinary course of business.

BY FACSIMILE I caused transmission of the foregoing document(s) by facsimile to the offices of the addressee(s), and such transmission was reported as complete and without error.

BY ELECTRONIC MAIL I caused the transmission of the foregoing document(s) by electronic mail to the offices of the addressee(s) at the e-mail addresses listed above.

BY PERSONAL SERVICE I personally delivered this envelope by hand to the offices of the addressee(s) listed above, pursuant to CCP §1011, by a person apparently in charge thereof.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

1 (FEDERAL) I declare that I am employed in the office of a member of the Bar of this Court
2 at whose direction the service was made.

3 Executed on February 20, 2018, at Santa Clara, California.

4 
5 Elaine Durand

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PROOF OF SERVICE
Page 2 of 3

1 **SERVICE LIST**

2
3 Erich Wise
4 Flynn, Delich & Wise, LLP
One World Trade Center, Suite 1800
Long Beach, CA 90831-1800

5 *Attorneys for Defendants*
6 TRUMP CARD, INC.; TRUMP
HOLDINGS, INC.; TRUMP CARD
CALIFORNIA, INC.; MAGNATE
HOLDINGS, LLC; MAGNATE
WORLDWIDE LLC; TIFLOR
TRANSPORTATION, LLC

7 Gina Beltramo
8 Coddington, Hicks & Danforth
555 Twin Dolphin Drive, Suite 300
Redwood City, CA 94065

9 *Attorneys for Defendants*
10 GHUMAN TRANSPORTATION
CORPORATION; BIRKIRAN SINGH

11 Nareshwar Singh Virdi
12 Acquest Law, Inc.
13 1900 Point West Way, Suite 270
Sacramento, CA 95815

14 *Attorneys for Defendant*
15 RAPID TRUCKING, LLC

16 Gordon McAuley
17 Williams & Gumbiner, LLP
18 100B Drakes Landing Road, Suite 260
Greenbrae, CA 94904

19 *Attorneys for Defendant*
20 LANDSTAR EXPRESS AMERICA, INC.
(Previously named as DOE 1 Landstar
21 Systems, Inc.)

22

23

24

25

26

27

28

PROOF OF SERVICE

Page 3 of 3

1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
Santa Clara, CA 95050
4 Telephone: 408/261-1200
Facsimile: 408/985-9042
5 kcb@bowervonraesfeld.com

6 Attorneys for Plaintiff
7 THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

10 THE BOARD OF TRUSTEES OF THE
11 LELAND STANFORD JUNIOR
12 UNIVERSITY,

13 Plaintiff,

14 v.

15 TRUMP CARD, INC. (a California
corporation and LLC); TIFLOR
16 TRANSPORTATION, LLC (a California
LLC) (dba TRUMP CARD SAN DIEGO);
17 TRUMP CARD HOLDINGS, INC. (a
California corporation and LLC); TRUMP
18 CARD CALIFORNIA, INC. (a California
corporation and LLC); SIMPATICO, INC. (a
19 California corporation); MAGNATE
HOLDINGS, LLC (corporate status
20 unknown); MAGNATE WORLDWIDE,
LLC (an Illinois LLC); GHUMAN
21 TRANSPORT CORPORATION (a
California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
22 LLC (a California corporation and LLC);
TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
24 TURNER (a California resident); and DOES
25 1 to 50, inclusive;

26 Defendants.

FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court

Case No.: 17 C 1 V 05727

DEFENDANT THE BOARD OF BY FAX
TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY'S
NOTICE OF DEPOSIT OF JURY FEES

17-CIV-05727
NPJF
Notice of Posting Jury Fees
876899



DEFENDANT THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY'S
NOTICE OF DEPOSIT OF JURY FEES

1

2 PLEASE TAKE NOTICE that Defendant THE BOARD OF TRUSTEES OF THE
3 LELAND STANFORD JUNIOR UNIVERSITY has deposited jury fees in the amount of
4 \$150.00 in the above referenced case.

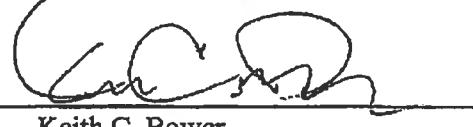
5

Respectfully Submitted,

6

BOWER • von RAESFELD

7

8 by: 

Dated: December 13, 2017

9 Keith C. Bower
10 Attorney for Defendant
11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR
13 UNIVERSITY

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-2-

DEFENDANT THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY'S
NOTICE OF DEPOSIT OF JURY FEES

1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
Santa Clara, CA 95050
4 Telephone: 408/261-1200
Facsimile: 408/985-9042
kcb@bowervonraesfeld.com

5 Attorneys for Plaintiff
6 THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

11 THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
12 UNIVERSITY,

13 Plaintiff,

14 v.

15 TRUMP CARD, INC. (a California
corporation and LLC); TIFLOR
16 TRANSPORTATION, LLC (a California
LLC) (dba TRUMP CARD SAN DIEGO);
17 TRUMP CARD HOLDINGS, INC. (a
California corporation and LLC); TRUMP
18 CARD CALIFORNIA, INC. (a California
corporation and LLC); SIMPATICO, INC. (a
19 California corporation); MAGNATE
20 HOLDINGS, LLC (corporate status
unknown); MAGNATE WORLDWIDE,
21 LLC (an Illinois LLC); GHUMAN
22 TRANSPORT CORPORATION (a
California corporation); BIRKIRAN SINGH
(a California resident); RAPID TRUCKING,
23 LLC (a California corporation and LLC);
24 TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
25 TURNER (a California resident); and DOES
1 to 50, inclusive;

26 Defendants.

FILED
SAN MATEO COUNTY

JAN 11 2018
Clerk of the Superior Court
By *[Signature]*
DRAFT COPY CLEAR

Case No.: 17 CIV 05727

NOTICE OF UNAVAILABILITY

F A X E D

17-CIV-05727
NUA
Notice of Unavailability of Counsel
918178



R E C E I V E D
SAN MATEO COUNTY

JAN 11 2018

Clerk of the Superior Court

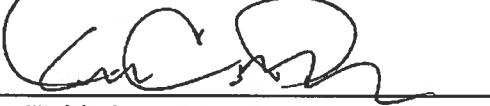
1 **TO DEFENDANTS AND THEIR ATTORNEY OF RECORD:**

2 **NOTICE IS HEREBY GIVEN** that commencing February 16, 2018 through and
3 including February 23, 2018, KEITH C. BOWER, Esq., attorney for Plaintiff The Board of
4 Trustees of the Leland Stanford Junior University will be traveling out of the country and will
5 be unavailable for any purpose whatsoever including, but not limited to, receiving notice of any
6 kind, responding to *ex parte* applications, appearing in court, appearing at depositions,
7 conferences or participating in trial.

8 **PLEASE BE ADVISED** that purposefully scheduling a conflicting proceeding without
9 good cause is sanctionable conduct. *See Tenderloin Housing Clinic v. Sparks*, (1992) 8
10 Cal.App.4th 299, 10 Cal.Rptr. 2nd 371.

11 Respectfully Submitted,

12 BOWER • von RAESFELD

13 by: 

14 Dated: January 8, 2018
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28
Keith C. Bower
Attorney for Plaintiff
THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY

1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
(Not a Partnership)
3 900 Lafayette Street, Suite 706
Santa Clara, CA 95050
4 Telephone: 408/261-1200
Facsimile: 408/985-9042
5 kob@bowervonraesfeld.com
6 Attorneys for Plaintiff
7 THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

**ENDORSED FILED
SAN MATEO COUNTY**

FEB 06 2018

Clark of the Superior Court
D. LINA FINAN
~~CLERK OF COURT~~

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

10 THE BOARD OF TRUSTEES OF THE
11 LELAND STANFORD JUNIOR
12 UNIVERSITY,

13 Plaintiff.

14 v.

15 TRUMP CARD, INC. (a California
corporation and LLC); TIFLOR
16 TRANSPORTATION, LLC (a California
LLC) (dba TRUMP CARD SAN DIEGO);
17 TRUMP CARD HOLDINGS, INC. (a
California corporation and LLC); TRUMP
18 CARD CALIFORNIA, INC. (a California
corporation and LLC); SIMPATICO, INC. (a
California corporation); MAGNATE
19 HOLDINGS, LLC (corporate status
unknown); MAGNATE WORLDWIDE,
20 LLC (an Illinois LLC); GHUMAN
TRANSPORT CORPORATION (a
California corporation); BIRKIRAN SINGH
21 (a California resident); RAPID TRUCKING,
LLC (a California corporation and LLC);
22 TRANS XPRESS LINE, INC. (a California
corporation); JERMAINE MARKEES
23 TURNER (a California resident); and DOES
24 1 to 50, inclusive;

25 Defendants.

26 Case No.: 17 CIV 05727

27 PLAINTIFF THE BOARD OF
TRUSTEES OF THE LEAND
STANFORD JUNIOR UNIVERSITY'S
AMENDMENT TO COMPLAINT
SUBSTITUTING TRUE NAMES FOR
FICTITIOUS NAME **F A X E D**

28 Complaint Filed: December 14, 2017
Trial Date: TBA

PLAINTIFF THE BOARD OF TRUSTEES OF THE LEAND STANFORD JUNIOR UNIVERSITY'S
AMENDMENT TO COMPLAINT SUBSTITUTING TRUE NAMES FOR FICTITIOUS NAME

1 At the time of the filing of the Complaint, Plaintiff was ignorant of the true names of
2 certain defendants and stated said fact in the Complaint and designated the defendants by
3 fictitious names. Having discovered the true names of certain defendants, Plaintiff hereby
4 amends the Complaint on file by inserting the following true names in place and instead of such
5 fictitious name wherever it appears in the Complaint pursuant to Code of Civil Procedure §474:

6 FICTITIOUS NAME:

7 DOE 1

8 DOE 2

6 TRUE NAME:

7 LANDSTAR SYSTEM, INC.

8 PRIDE LOGISTICS

9 Respectfully Submitted,

10 BOWER • von RAESFELD

11 

12 Dated: February 5, 2018 by: Keith C. Bower
13 Attorney for Plaintiff
14 THE BOARD OF TRUSTEES OF THE
15 LELAND STANFORD JUNIOR
16 UNIVERSITY

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PLAINTIFF THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY'S
AMENDMENT TO COMPLAINT SUBSTITUTING TRUE NAMES FOR FICTITIOUS NAME

GENERAL ALLEGATIONS

1. At all times relevant to this lawsuit, Cross-Complainant LANDSTAR was and is a corporation authorized to do and doing business within the State of California.

4 2. At all times relevant herein, Cross-Defendant GHUMAN, was a corporation,
5 authorized to and doing business within the State of California.

6 3. That the true names and capacities, whether individual, corporate, associate or
7 otherwise, of cross-defendants ROES 1 through 50, inclusive, and each of them, are unknown to
8 this Cross-Complainant who, therefore, sues said cross-defendants by such fictitious names, and,
9 Cross-Complainant prays that when the true names and capacities are ascertained, it may have
10 leave to file its amendment as to the true names and capacities together with appropriate charging
11 allegations.

12 4. Cross-Complainant LANDSTAR is informed and believes and thereon alleges that
13 at all times herein mentioned each of the Cross-Defendants was the agent and/or employee of the
14 remaining Cross-Defendants, and each of them, and in doing the acts hereafter alleged, were
15 acting within the course and scope of such agency and/or employment and/or with the permission
16 and/or consent the remaining Cross-Defendants, and each of them.

17 5. Cross-Complainant LANDSTAR has been named a party defendant in the
18 Complaint pending in the San Mateo County Superior Court, Action Number 17CIV 05727.

19 6. In its Complaint Plaintiff alleges loss or damage to cargo transported in interstate
20 commerce by Cross-Defendant GHUMAN, or its agents or assigns, due to a traffic accident
21 occurring on or about January 24, 2017. Plaintiff asserts the alleged cargo loss or damage
22 occurred due to the negligence or breach of contract of GHUMAN, and others, including Cross-
23 Complainant LANDSTAR.

24 7. LANDSTAR, as a freight broker, and upon request of other parties, assigned the
25 carriage of the subject cargo to GHUMAN pursuant to a written contract between LANDSTAR
26 and GHUMAN. LANDSTAR never had actual or constructive possession of the subject cargo.

FIRST CAUSE OF ACTION

BREACH OF WRITTEN CONTRACT

3 8. Cross-Complainant LANDSTAR realleges and incorporates by reference each and
4 every allegation contained in paragraphs 1 through 7, above, as if fully set forth herein.

5 9. On or about October 3, 2016 LANDSTAR and GHUMAN entered into a written
6 broker/carrier agreement (“Agreement”) by which LANDSTAR, as a freight broker agreed to
7 assign, and GHUMAN, as a licensed interstate motor carrier agreed to transport, cargo shipments.

8 10. The material provisions of that Agreement include GHUMAN's agreement to
9 defend, indemnify, and hold LANDSTAR harmless from and against all loss, liability, judgments
10 damages, claims, fines, costs or expense, including reasonable attorney's fees, arising out of or in
11 any way related to, GHUMAN's performance of its obligations under the Agreement.

11. After the alleged cargo loss or damage claim described in Paragraph 6, above,
12 LANDSTAR demanded that GHUMAN pay the alleged cargo loss and damage claim, and to
13 defend, indemnify and hold harmless LANDSTAR from those claims asserted by Plaintiff in its
14 Complaint.

16 12. LANDSTAR has fully performed all conditions, covenants, and promises to be
17 performed on its part under the Agreement.

18 13. GHUMAN has refused, and continues to refuse, to defend, indemnify and hold
19 LANDSTAR harmless from such claims, in violation and breach of the written terms of the
20 Agreement.

14. As a proximate result of GHUMAN's breach of the Agreement, as herein alleged,
LANDSTAR has been damaged in an amount to be proven at trial.

23 WHEREFORE, LANDSTAR prays for relief as set for below.

SECOND CAUSE OF ACTION

EQUITABLE INDEMNITY

26 15. LANDSTAR re-alleges and reincorporates each and every allegation contained in
27 the General Allegations, and all previous paragraphs of each preceding cause of action of this
28 Cross-Complaint, as if fully set forth herein.

1 16. LANDSTAR is informed and believes and thereon alleges that GHUMAN, and
 2 each Cross-Defendant designated herein as a ROE Cross-Defendant, is negligently, statutorily,
 3 vicariously, or otherwise legally responsible in some manner for the claims and damages asserted
 4 by Plaintiff in its underlying Complaint, and incorporated herein expressly by reference for the
 5 purpose of stating this cause of action only, alleges LANDSTAR caused and contributed to the
 6 damages alleged by Plaintiff. LANDSTAR denies that it either caused or contributed to those
 7 alleged damages. If, however, it is found that LANDSTAR is responsible under the law for any of
 8 the allegations contained the complaint, then LANDSTAR is informed and believes and thereon
 9 alleges that the acts and/or omissions Cross-Defendants, and each of them, proximately caused
 10 and contributed to the damages alleged by Plaintiff.

11 17. While LANDSTAR denies it either caused or contributed to the damages
 12 described in Plaintiff's Complaint, LANDSTAR alleges that if plaintiff was injured as alleged,
 13 LANDSTAR's liability for such injuries was passive, secondary and derivative in nature, and the
 14 conduct attributable to Cross-Defendants, and each of them, was the direct, active and primary
 15 cause of LANDSTAR'S exposure, if any, to liability to Plaintiff herein.

16 18. Because of the foregoing, in equity and good conscience, LANDSTAR is entitled
 17 to indemnity form Cross-Defendants, and each of them, for the claims and damages alleged in
 18 Plaintiff's Complaint.

19 19. Because of the foregoing, in equity and good conscience, LANDSTAR is also
 20 entitled to recover from Cross-Defendants, and each of them, LANDSTAR'S costs of defending
 21 the principal action and in prosecuting this Cross-Complaint, including actual attorneys' fees and
 22 costs.

23 20. LANDSTAR therefore seeks partial or equitable or total indemnity against Cross-
 24 Defendants, and each of them, assume the defense of LANDSTAR, taking such steps as are
 25 proper to protect the interests of LANDSTAR including payment of all expenses and judgment
 26 against LANDSTAR.

27 21. LANDSTAR necessarily retained the law firm WILLIAMS & GUMBINER LLP
 28 to defend this action and prosecute this Cross-Complaint herein, and has incurred legal fees, court

1 costs and discovery costs, and will in the future incur further costs, in an amount according to
2 proof.

3 WHEREFORE, LANDSTAR prays for relief as set forth below.

5 **THIRD CAUSE OF ACTION**

6 **CONTRIBUTION**

7 22. LANDSTAR re-alleges and reincorporates each and every allegation contained in
8 the General Allegations, and all previous paragraphs of each preceding cause of action of this
9 Cross-Complaint, as if fully set forth herein.

10 23. Cross-Defendants, and each of them, owe a duty of indemnification or
11 contribution to LANDSTAR for any judgment obtained against LANDSTAR in proportion to the
12 percentage of fault, negligence, breach of duty of due care, or other tortious conduct attributable
13 to Cross-Defendants, and each of them, for the acts and omissions stated above.

14 24. LANDSTAR, therefore, seeks full or partial equitable indemnity or contribution
15 from Cross-Defendants, and each of them, in an amount equal to a portion of any judgment
16 obtained against LANDSTAR in proportion to the percentage of fault, negligence, breach of duty
17 or due care or other tortious conduct attributable to Cross-Defendants, and each of them.

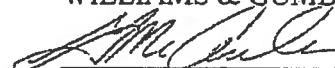
18 WHEREFORE, LANDSTAR prays for relief as set forth below.

19 **PRAYER FOR RELIEF**

- 20 1. For general damages according to proof;
- 21 2. For special damages according to proof;
- 22 3. For LANDSTAR'S expenses and costs, including attorneys' fees, incurred in this
23 litigation;
- 24 4. For such other and further relief as this court deems just and proper.

25 DATED: March 1, 2018

WILLIAMS & GUMBINER LLP



26 Gordon McAuley

27 Attorneys for Defendant and Cross-
28 Complainant LANDSTAR EXPRESS
AMERICA, INC.

PROOF OF SERVICE

Case Name: The Board of Trustees of the Leland Stanford Junior University
San Mateo Superior NO: 17 CIV05727

I, the undersigned, under penalty of perjury, declare that I am a citizen of the United States, over the age of 18 years and not a party to the within entitled cause of action. My business address is 100 Drakes Landing Road, Suite 260, Greenbrae, California 94904, and I am employed in Marin County, California. On March 1, 2018, I served a true copy of:

ANSWER OF LANDSTAR EXPRESS AMERICA, INC.

**CROSS-COMPLAINT FOR BREACH OF CONTRACT; EQUITABLE INDEMNITY; AND
CONTRIBUTION**

I caused to be served said document on the following parties involved as follows:

Keith C. Bower, Esq.
Bower Von Raesfeld
900 Lafayette Street, Suite 706
Santa Clara, CA 95050
408/261-1200
Fax: 408/985-9042
kcb@bowervonraesfeld.com
Attorney for Plaintiff

	By facsimile machine (FAX) by personally transmitting a true copy thereof via an electronic facsimile machine between the hours of 9:00 a.m. and 5:00 p.m.
X	By First Class Mail by depositing sealed envelopes in the United States mail at Greenbrae, California with postage fully prepaid.
	E-Service: via File & ServeXpress.
	By Personal Delivery: I caused each such envelope above to be delivered by hand to the office of each addressee noted.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on March 1, 2018, at Greenbrae, California.

Victoria Redoroff

4/12/18
MC

1 Gordon McAuley (99932)
2 WILLIAMS & GUMBINER LLP
3 100 Drakes Landing Road, Suite 260
4 Greenbrae, CA 94904
5 Phone: (415) 755-1880
6 gmcrauley@williamsgumbiner.com

7 Attorneys for Defendant
8 LANDSTAR EXPRESS AMERICA, INC.
9
10

FILED
SAN MATEO COUNTY

MAR 01 2018

Clerk of the Superior Court
By _____
DEPUTY CLERK

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN MATEO

11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR UNIVERSITY,

13 Plaintiff,

14 vs.

15 TRUMP CARD, INC., et al.,

16 Defendants.

Case No. 17 CIV 05727

ANSWER OF LANDSTAR EXPRESS
AMERICA, INC.

Complaint Filed: 12/14/17

Trial Date: n/a

17
18 Defendant LANDSTAR EXPRESS AMERICA, INC. answers Plaintiff THE BOARD OF
19 TRUSTEES OF THE LELAND STANDORD JUNIOR UNIVERSITY'S unverified complaint as
20 follows:

21 Except as expressly admitted, pursuant to Section 431.30(d) of the California Code of
22 Civil Procedure, Defendant generally denies each and every allegation in the Complaint.
23 Defendant further denies, both generally and specifically, that Plaintiff is, has been, or will be
24 damaged as otherwise alleged by any act or omission of Defendant, or that Plaintiff is, or will be,
25 entitled to any relief against Defendant, either as alleged or otherwise.

17-CIV-05727
ARDU
Answer (Unlimited)
1006358



File By Fax

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

1. The Complaint, and each cause of action therein, fails to state a cause of action against this Answering Defendant.

SECOND AFFIRMATIVE DEFENSE

2. The Complaint, and each cause of action therein, is barred by the doctrine of waiver.

THIRD AFFIRMATIVE DEFENSE

3. The Complaint, and each cause of action therein, is barred by the doctrine of estoppel.

FOURTH AFFIRMATIVE DEFENSE

4. The Complaint, and each cause of action therein, is barred by the doctrine of Unclean Hands.

FIFTH AFFIRMATIVE DEFENSE

5. The Complaint, and each cause of action therein, is barred by the contracts between the parties, including without limitation, Plaintiff's contracts with each Defendant.

SIXTH AFFIRMATIVE DEFENSE

6. The Complaint, and each cause of action therein, is barred by Defendant Ghuman Transport Company's breach of contract.

SEVENTH AFFIRMATIVE DEFENSE

7. The Complaint, and each cause of action therein, is barred by the principal of equitable indemnity.

EIGHTH AFFIRMATIVE DEFENSE

8. The Complaint, and each cause of action therein, is barred by the principal of payment.

NINTH AFFIRMATIVE DEFENSE

9. Defendant denies that Plaintiff was damaged in the amount alleged in its Complaint, or in any amount at all.

TENTH AFFIRMATIVE DEFENSE

2 10. Plaintiff had full knowledge of all risks involved in its actions, and voluntarily
3 assumed the risk of the injury and damage of which it complains.

ELEVENTH AFFIRMATIVE DEFENSE

5 11. Plaintiff's injuries, if any, were caused or contributed to by the carelessness,
6 negligence, or fault of persons or entities other than this responding Defendant.

TWELFTH AFFIRMATIVE DEFENSE

8 12. The legal determination of the rights and obligations between the parties is subject
9 to state law, rather than federal law.

THIRTEENTH AFFIRMATIVE DEFENSE

11 13. Plaintiff's damages, if any, are limited by the Carmack Amendment to the
12 Interstate Commerce Act, 49 U.S.C. Section 14707.

FOURTEENTH AFFIRMATIVE DEFENSE

14. Plaintiff's damages, if any, are limited by contractual agreement.

FIFTEENTH AFFIRMATIVE DEFENSE

16. Defendant performed all obligations owed to Plaintiff, except those obligations
17. Defendant was prevented or excused from performing by the acts and or omissions of Plaintiff, or
18. other persons.

SIXTEENTH AFFIRMATIVE DEFENSE

21 16. Defendants are informed and believe that they complied with the instructions of
22 Plaintiffs where applicable for the services at issue.

SEVENTEENTH AFFIRMATIVE DEFENSE

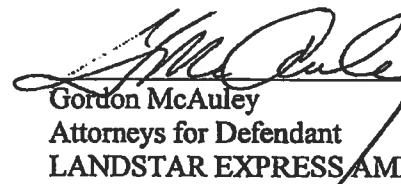
24 17. Defendants reserve the right to assert additional affirmative defenses in the event that
25 additional defenses become apparent during the course of this litigation.

1 WHEREFORE, DEFENDANT prays for judgment as follows:

2 1. That Plaintiff take nothing by way of its Complaint, and judgment re rendered in
3 favor of Defendant;
4 2. Defendant be awarded attorney fees and costs of suit herein;
5 3. For such other and further relief as the Court deems just and proper.

6
7 DATED: March 1, 2018

WILLIAMS & GUMBINER LLP

8
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10 
11 Gordon McAuley
12 Attorneys for Defendant
13 LANDSTAR EXPRESS AMERICA, INC.

14 G:\CLIENT DOCUMENTS\Landstar Express\Pleadings\Complaint, Answers and XCs\2018-02-27 Answer.doc

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PROOF OF SERVICE

Case Name: The Board of Trustees of the Leland Stanford Junior University
San Mateo Superior NO: 17 CIV05727

I, the undersigned, under penalty of perjury, declare that I am a citizen of the United States, over the age of 18 years and not a party to the within entitled cause of action. My business address is 100 Drakes Landing Road, Suite 260, Greenbrae, California 94904, and I am employed in Marin County, California. On March 1, 2018, I served a true copy of:

ANSWER OF LANDSTAR EXPRESS AMERICA, INC.

**CROSS-COMPLAINT FOR BREACH OF CONTRACT; EQUITABLE INDEMNITY; AND
CONTRIBUTION**

I caused to be served said document on the following parties involved as follows:

Keith C. Bower, Esq.
Bower Von Raesfeld
900 Lafayette Street, Suite 706
Santa Clara, CA 95050
408/261-1200
Fax: 408/985-9042
kcb@bowervonraesfeld.com
Attorney for Plaintiff

	By facsimile machine (FAX) by personally transmitting a true copy thereof via an electronic facsimile machine between the hours of 9:00 a.m. and 5:00 p.m.
X	By First Class Mail by depositing sealed envelopes in the United States mail at Greenbrae, California with postage fully prepaid.
	E-Service: via File & ServeXpress.
	By Personal Delivery: I caused each such envelope above to be delivered by hand to the office of each addressee noted.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on March 1, 2018, at Greenbrae, California.

WSBSERVER|Redirects|Folders|Victoria Fedoroff|My Documents|ROS_Educati7.htm

1 Keith C. Bower, Esq. (State Bar No. 135243)
2 Bower • von Raesfeld
3 (Not a Partnership)
4 900 Lafayette Street, Suite 706
5 Santa Clara, CA 95050
6 Telephone: 408/261-1200
7 Facsimile: 408/985-9042
8 kcb@bowervonraesfeld.com

9
10 Attorneys for Plaintiff
11 THE BOARD OF TRUSTEES OF THE
12 LELAND STANFORD JUNIOR UNIVERSITY

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF SAN MATEO – UNLIMITED JURISDICTION

16 THE BOARD OF TRUSTEES OF THE
17 LELAND STANFORD JUNIOR
18 UNIVERSITY,

19 Plaintiff,

20 v.

21 TRUMP CARD, INC. (a California
22 corporation and LLC); TIFLOR
23 TRANSPORTATION, LLC (a California
24 LLC) (dba TRUMP CARD SAN DIEGO);
25 TRUMP CARD HOLDINGS, INC. (a
26 California corporation and LLC); TRUMP
27 CARD CALIFORNIA, INC. (a California
28 corporation and LLC); SIMPATICO, INC. (a
29 California corporation); MAGNATE
30 HOLDINGS, LLC (corporate status
31 unknown); MAGNATE WORLDWIDE,
32 LLC (an Illinois LLC); GHUMAN
33 TRANSPORT CORPORATION (a
34 California corporation); BIRKIRAN SINGH
35 (a California resident); RAPID TRUCKING,
36 LLC (a California corporation and LLC);
37 TRANS XPRESS LINE, INC. (a California
38 corporation); JERMAINE MARKEES
39 TURNER (a California resident); and DOES
40 1 to 50, inclusive;

41 Defendants.

42 Case No.: 17 CIV 05727

43 PLAINTIFF THE BOARD OF
44 TRUSTEES OF THE LELAND
45 STANFORD JUNIOR UNIVERSITY'S
46 STATEMENT OF DAMAGES

47
48 Complaint Filed: December 14, 2017
49 Trial Date: TBA

50
51 PLAINTIFF THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY'S
52 STATEMENT OF DAMAGES

1 Plaintiff, The Board of Trustees of the Leland Stanford Junior University, hereby
2 submits the following statement of damages:
3 Property damage to magnetic undulator: \$350,000.00
4 Loss of use of magnetic undulator: \$150,000.00
5 Redesign costs due to damage to equipment: \$ 95,000.00
6 Towing of magnetic undulator to Chicago for repair after accidents: \$ 3,500.00
7 Prejudgment interest (at 10%) from date of accident: \$36,000.00/year
8 and growing
9 Attorneys' fees: \$200,000.00
10 Total damages (excluding costs of suit and post judgment interest): \$834,500.00

11 Respectfully Submitted,

12 BOWER • von RAESFELD

13 by: 

14 Keith C. Bower
15 Attorney for Plaintiff
16 THE BOARD OF TRUSTEES OF THE
17 LELAND STANFORD JUNIOR
18 UNIVERSITY

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28 Dated: February 6, 2018

SUM-110

SUMMONS
Cross-Complaint
(CITACION JUDICIAL-CONTRADEMANDA)

*4/12/2009
Came*
NOTICE TO CROSS-DEFENDANT:
(AVISO AL CONTRA-DEMANDADO): GHUMAN TRANSPORT
 CORPORATION and ROES 1 THROUGH 50,

YOU ARE BEING SUED BY CROSS-COMPLAINANT:
(LO ESTÁ DEMANDANDO EL CONTRADEMANDANTE):
 LANDSTAR EXPRESS AMERICA, INC.

FOR COURT USE ONLY (SOLO PARA USO DE LA CORTE)
FILED
SAN MATEO COUNTY
MAR 01 2018
Clerk of the Superior Court
By <i>[Signature]</i> DEPUTY CLERK

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the cross-complainant. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al contrademandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte lo podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), o manténgase en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court of California, County of San Mateo

400 County Center

Redwood City, CA 94063

The name, address, and telephone number of cross-complainant's attorney, or cross-complainant without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del contrademandante, o del contrademandante que no tiene abogado, es):

Williams & Gumbiner LLP

100 Drakes Landing Road, Suite 260, Greenbrae, CA 94904

DATE: **MAR 01 2018**

(Fecha)

RODINA M. CATALANO

Clerk, by
(Secretario)

415-755-1880

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons (POS-010).)

NOTICE TO THE PERSON SERVED: You are served



1. as an individual cross-defendant.

2. as the person sued under the fictitious name of (specify):

3. on behalf of (specify):

under: CCP 416.10 (corporation)
 CCP 416.20 (defunct corporation)
 CCP 416.40 (association or partnership)
 other (specify):

CCP 416.60 (minor)
 CCP 416.70 (conservatee)
 CCP 416.90 (authorized person)

4. by personal delivery on (date):

17-CIV-05727
 SCCOMP
 Summons Cross-Complaint for Civil Division
 1006387



SUM-100

SUMMONS
(CITACION JUDICIAL)

**NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC; SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS**

**YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY**

**ENDORSED FILED
SAN MATEO COUNTY**

DEC 14 2017

Clerk of the Superior Court
By: UNA FINAN
DEPUTY CLERK

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS to do this. This summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courts.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.calleg.org/firms), the California Courts Online Self-Help Center (www.courts.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for unpaid fees and costs on any judgment or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lee la información a continuación.

Tiempo 30 DIAS DE CALENDARIO después de que se entreguen esta citación y papeles legales para presentar una respuesta por escrito en su corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto y debe irse presentar en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios en la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtselfhelp.ca.gov), en la biblioteca de leyes de su condado o en la corte que lo que más cerca. Si no puede pagar la tarifa de presentación, pida al secretario de la corte que dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte lo podrá quitar su sueldo, dinero y bienes en más adverso.

Hay otros requisitos legales. Es recomendable que hable a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de referencia a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos en línea de acuerdo con el sitio Web de California Legal Services, (www.calleg.org/firms), en el Centro de Ayuda de las Cortes de California, (www.courtselfhelp.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados local. AVISO: Por lo tanto, la corte tiene derecho a reclamar las cuotas y las costas causadas para imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión en arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda deshacer el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063
The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KRITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Bower von Reesfeld
900 Laffey Street, Suite 705, SANTA CLARA, CA 95050
DATE: DEC 14 2017 Clerk, by
(Fecha) RODINA M. CATALANO (Secretario) JUNA FINAN Deputy
(Para prueba de entrega de este aviso use el formulario Proof of Service of Summons, (POS-010).
(Para prueba de entrega de este aviso use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify): Magneti Holdings, LLC (corporate status unknown)
3. on behalf of (specify):
under: CCP 418.10 (corporation) CCP 418.80 (minor)
 CCP 418.20 (defunct corporation) CCP 418.70 (conservatee)
 CCP 418.40 (association or partnership) CCP 418.80 (authorized person)
other (specify): 415.95 Business Entity status unknown

4. by personal delivery on (date): 28 SEP 2017

408-261-3200

. Deputy
(Adjunta)

Page 1 of 1
Code of Civil Procedure 1011220 rev. 06/1/2009
www.courtselfhelp.ca.gov
Standard Form 14, Rev. 1/2009

SUMMONS
(CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and (AVISO AL DEMANDADO): LLC; SEE ATTACHMENT SUM-200(A) FOR ADDITIONAL DEFENDANTS)

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF (LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD JUNIOR UNIVERSITY

SUM-100

FOR COURT USE ONLY
SOLO PARA USO DE LA CIUDAD

ENDORSED FILED
SAN MATEO COUNTY

DEC 14 2017

Clerk of the Superior Court
UNA FINA
SAC

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information on the California Courts Online Self-Help Center (www.courtinfo.ca.gov/schelp/), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups on the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/schelp/), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any judgment or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will discharge the case. (AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lee la información e continúa).

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en su corte y hacer que no se retrasen más de lo establecido. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito debe estar en formato legal correcto a dentro de 30 días de presentar su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios en la Carta y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida el secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte lo podrá quitar su asiento, dinero y bienes sin más aviso.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de referidos a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos en Anexos de lucro en el sitio Web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.courtinfo.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados de su localidad. AVISO: Por lo tanto, la corte tiene derecho a redimir las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda deshacer el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

Case Number:

17CIV05727

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandado, o del demandante que no tiene abogado, es):

Bower van Reesfeld

900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

408-261-1200

DATE:
(Fecha)

DEC 14 2017

RODINA M. CATALANO

Clerk, by
(Secretario)

U.L.J. 14.11

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (Form POS-010).
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify):

3. on behalf of (specify): *Magnate Worldwide, LLC (an Illinois LLC)*

Under: CCP 418.10 (corporation)
 CCP 418.20 (defunct corporation)
 CCP 418.40 (association or partnership)
 other (specify): *LLC*

CCP 418.60 (minor)
 CCP 418.70 (conservatee)
 CCP 418.80 (authorized person)

4. by personal delivery on (date): *12/14/17*

Page 1 of 1
Code of Civ. Procedure §§ 412.20, 405
www.courtinfo.ca.gov
Superior Court of California

Form Adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. 1-2002)

SUMMONS

EXHIBIT A

SUM-200(A)

SHORT TITLE: STANFORD UNIVERSITY v. TRUMP CARD, INC., et al.	CASE NUMBER:
--	--------------

INSTRUCTIONS FOR USE

→ This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
→ If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party):

Plaintiff Defendant Cross-Complainant Cross-Defendant

TIFLOR TRANSPORTATION, LLC (a California LLC) (dba TRUMP CARD SAN DIEGO); TRUMP CARD HOLDINGS, INC. (a California corporation and LLC); TRUMP CARD CALIFORNIA, INC. (a California corporation and LLC); SIMPATICO, INC. (a California corporation); MAGNATE HOLDINGS, LLC (corporate status unknown); MAGNATH WORLDWIDE, LLC (an Illinois LLC); GHUMAN TRANSPORT CORPORATION (a California corporation); BIRKIRAN SINGH (a California resident); RAPID TRUCKING LLC (a California corporation and LLC); TRANS XPRESS LINE, INC. (a California corporation); JERMAINE MARKES TURNER (a California resident); and DOES 1 to 50, inclusive

Page 1 of 1
Page 1 of 1

Form Adopted for Mandatory Use
April 1, 2000
Judicial Branch of California
GSA-CIO(A) (Rev. January 1, 2007)

ADDITIONAL PARTIES ATTACHMENT
Attachment to Summons

Westlaw Doc & Filing Center

SUMMONS
(CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and (AVISO AL DEMANDADO): LLC); SEE ATTACHMENT SUM-200(A) FOR ADDITIONAL DEFENDANTS

YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF (LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD JUNIOR UNIVERSITY

SUM-100

FOR COURT USE ONLY (SOLO PARA USO DE LA CORT)	ENDORSED FILED SAN MATEO COUNTY
DEC 14 2017	
Clerk of the Superior Court UNA FINA EASITY FILED	

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS etc. This summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courts.ca.gov/courtselfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtself.ca.gov/courtselfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. (AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lee la información e continuearán).

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en este caso y hacer que su abogado una copia el demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito debe que estar en formato legal cuando se deje que procesen su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.succita.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la tarifa de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte lo podrá quitar su sueldo, dinero y bienes sin más aviso.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de referencias a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin ánimo de lucro. Puede encontrar estos grupos en línea en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.succita.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos sin tener que imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibido mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desarchar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

CASE NUMBER:
Número del Caso:

17CIV05727

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower von Reesfeld
900 Lalleyte Street, Suite 706, SANTA CLARA, CA 95050

408-261-1200

DATE: **DEC 14 2017** Clerk, by
(Firma) **RODINA M. CATALANO** (Secretario) **USA** **7-15-17** Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (Form POS-010).)
(Para prueba de entrega de este citación use el formulario Proof of Service of Summons, (POS-010).)

NOTICE TO THE PERSON SERVED: You are served

DEBTOR

1. as an individual defendant.
 2. as the person sued under the fictitious name of (specify): **(dba TrumpCard San Diego)**
 3. on behalf of (specify): **Triflor Transportation LLC (a California LLC)(dba Trump Card San Diego)**
 under: CCP 418.10 (corporation) CCP 418.80 (minor)
 CCP 418.20 (defunct corporation) CCP 418.70 (conservatee)
 CCP 418.40 (association or partnership) CCP 418.80 (authorized person)
 4. other (specify): **LLC** **1/18/2018 P.L.W.**

Form Adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. Jan. 1, 2002)

SUMMONS

Page 1 of 1
Code of Civil Procedure §§ 412.20, 418
www.courtself.ca.gov
Voluntary Date & Service Statement

EXHIBIT A

SUM-100

SUMMONS
(CITACION JUDICIAL)

NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC; SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS

**YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY**

FOR COURT USE ONLY SOLO PARA USO DE LA DICTADA	
ENDORSED FILED SAN MATEO COUNTY	
DEC 14 2017	
Clerk of the Superior Court UNA FINA ENRICO GILLET	

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want this court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courts.ca.gov/ehelp/), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courts.ca.gov/ehelp/), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for uncollected fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lee la Información e continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en su corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto 30 días para presentar su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios en el Centro de Ayuda de las Cortes de California (www.courts.ca.gov), en la biblioteca de leyes de su condado o en la corte que lo quiere más cerca. Si no puede pagar la tasa de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte lo podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de jurisdicción a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin ánimo de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio Web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.courts.ca.gov) o ponéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a redimir los cuotas y los cuotas exentas por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tenga que pagar el gravamen de la corte, antes de que la corte pueda deshacer el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

CASE NUMBER:
Número del Caso:

17C1V05727

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Bower von Reesfeld
900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

408-261-1200

DATE: **DEC 14 2017** Clerk, by: **RODINA M. CATALANO** Deputy
(Fecha) (Secretaria) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (Form POS-010).
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

RECEIVED

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify):

3. on behalf of (specify): *Trump Card California, Inc. (a California Corporation & LLC)*

under: CCP 416.10 (corporation)
 CCP 416.20 (defunct corporation)
 CCP 416.40 (association or partnership)

CCP 416.80 (minor)

CCP 416.70 (conservator)

CCP 416.90 (authorized person)

4. other (specify): *2/8*

4. by personal delivery on (date): *2/8*

P. L. S.

Page 1 of 1
Code of Civil Procedure § 412.20, 485
www.courtinfo.ca.gov
Handwritten Date of Person Delivered

Form adopted for Mandatory Use
Judicial Council of California
SUM-100 (Rev. 1-2008)

SUMMONS

EXHIBIT A

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC; SEE ATTACHMENT
SUM-200(A) FOR ADDITIONAL DEFENDANTS**

**YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LELAND STANFORD
JUNIOR UNIVERSITY**

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS etc. This summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written responses must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/courtselfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to see an attorney right away. If you do not know an attorney, you may want to see an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/courtselfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for attorney fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información e continúe.

TIENE 30 DÍAS DE CALENDARIO después de que lo entreguen esta acción y papeles legales para presentar una respuesta por escrito en la corte y hacer que se entienda una notificación de la demanda. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto al hacerlo y presentar su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.succarts.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida el asistente de la corte que lo dé un formulario de extensión de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte lo podrá quitar su premio, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de orientación a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales en línea de la corte. Puede encontrar estos grupos en línea en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.succarts.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados local. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor resarcido mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte, antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandado, o del demandante que no tiene abogado, es):
Bower von Reesfeld
900 Lafayette Street, Suite 706, SANTA CLARA, CA 95050

DATE: **DEC 14 2017** Clerk, D/ **RODINA M. CATALANO** Deputy **408-261-1200**
(Fecha) (Secretario) (Aufsicht)

(For proof of service of this summons, use Proof of Service of Summons (Form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify):
3. on behalf of (specify): **Trump Card Holdings, Inc (a California Corporation & LLC)**
under: CCP 418.10 (corporation)
 CCP 418.20 (defunct corporation)
 CCP 418.40 (association or partnership)
4. other (specify): **LLC**
by personal delivery on (date): **7/8 E.P. W.**

SUMMONS

Form adopted for Unified Court Use
Judicial Council of California
SUM-100 (Rev. Jan. 1, 2004)

Page 1 of 1
Code of Civ. Procedure §§ 412.20, 406
www.courtinfo.ca.gov
www.courtinfo.ca.gov
Version 09/04/2010

FOR COURT USE ONLY
SÓLO PARA USO DE LA CORTES

**ENDORSED FILED
SAN MATEO COUNTY**

DEC 14 2017

Clerk of the Superior Court
UNA FINAL
EX-100

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT: TRUMP CARD, INC., (a California corporation and
(AVISO AL DEMANDADO): LLC; SEE ATTACHMENT
SUM-100(A) FOR ADDITIONAL DEFENDANTS**

**YOU ARE BEING SUED BY PLAINTIFF: THE BOARD OF TRUSTEES OF
(LO ESTÁ DEMANDANDO EL DEMANDANTE): THE LEELAND STANFORD
JUNIOR UNIVERSITY**

FOR COURT USE ONLY
SOLO PARA USO DE LA CORT

**ENDORSED FILED
SAN MATEO COUNTY**

DEC 14 2017

Clerk of the Superior Court
2017 UNA FINAL
EX-CTY CLERK

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form. If you want the court to hear your case, there may be a court form that you can use for your response. You can find these court forms and more information of the California Courts Online Self-Help Center (www.courtinfo.ca.gov/schelp/), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/schelp/), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any judgment or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir no su caso sin escuchar su versión. Lee la información e instrucción.**

Tiene 30 DÍAS DE CALENDARIO después de que lo entreguen esta citación y papeles legales para presentar una respuesta por escrito en este caso y hacer que se lo entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito debe que estar en formato legal correcto a dentro de 30 días de presentar su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov), en las bibliotecas de leyes de su condado o en la corte que lo queda más cerca. Si no puede pagar la tasa de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de costos. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte lo podrá quitar su salario, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que hable a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de revisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.courtinfo.ca.gov) o poniéndose en contacto con la corte o al consejo de abogados locales. AVISO: Por lo tanto, tiene derecho a reclamar las costas y las costas exentas por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte, antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):
Superior Court of California, County of San Mateo
400 County Center
Redwood City, California 94063

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: KEITH C. BOWER, ESQ.
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Bower van Rensfeld
900 Lathryte Street, Suite 706, SANTA CLARA, CA 95050

DATE: **DEC 14 2017** Clerk, by: **RODINA M. CATALANO** (Secretary) **11/13 11:45:11** 408-261-1200

(Fecha)

For proof of service of this summons, use Proof of Service of Summons (Form POS-010).
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify): **Trump Card, Inc. (a California Corporation and LLC)**
3. on behalf of (specify): **under: CCP 418.10 (corporation)**
CCP 418.20 (defunct corporation)
CCP 418.40 (association or partnership)
other (specify): LLC
4. by personal delivery on (date): **7/18 2017** **g.p.u**

SUMMONS

Form adopted for Ministry Use
Judicial Council of California
SUM-100 (Rev. 12/1/2004)

Code of Civil Procedure § 1120, 483
www.courtinfo.ca.gov
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